



## PRODEA REAL ESTATE INVESTMENT COMPANY SOCIÉTÉ ANONYME

### PRIVACY NOTICE

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**GENERAL COMMERCIAL REGISTRY:** 3546201000, **HCMC APPROVAL** No: 6/458/13.12.2007

## I. Introduction

«Prodea Real Estate Investment Company Société Anonyme» (hereafter “the Company”), in its capacity as Data Controller, recognizes the importance of its obligation to comply with the applicable regulatory and legislative framework regarding professional secrecy and the protection of privacy and Personal Data, in general.

This notice aims is to inform possible and/or existing customers and/or counterparties in any capacity and for any reason with the Company, regarding the processing of their personal data, in the context of the performance of its activities and their general relation with the Company, in accordance with the applicable national and union regulatory framework governing the protection of personal data, in particular the EU General Data Protection Regulation [Regulation (EU) 2016/679 (GDPR) ] and Hellenic Law 4624/2019 .

## II. Definitions

For the purposes of this Notice, the following notions should be defined as:

**«Personal Data»:** any information relating to an identified or identifiable natural person (**‘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.

**«Special categories of Personal Data»:** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**«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.

**«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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**«Processor»:** a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**«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.

**«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.

**«Existing Legislation»:** The provisions of the existing Hellenic, Union and/or other Legislation concerning issues of protection of personal data, such as in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Regulation for Data Protection, GDPR), the Hellenic Law 4624/2019, as it is currently in force, as well as the Decisions, Recommendations and Guidelines of the Hellenic Data Protection Authority.

### III. Notice/ Provision of Information

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### **1. Who we are**

«Prodea Real Estate Investment Company Société Anonyme» (website [www.prodea.gr](http://www.prodea.gr)), is a real estate investment company, registered in the “General Commercial Registry”, under registration number 003546201000, has its registered address in the Municipality of Athens, Chrysospiliotisis 9, PC 10560 and its corporate purpose is the acquisition and management of real estate property and investments, in general, as provided in article 22 of Law 2778/1999 as in force from time to time, as well as the performance of any activity of the Company, as General Partnership with internal management under the Law 4209/2013, as in force from time to time.

### **2. Personal Data that we collect and process - Purpose of Processing - Legal Basis of Processing**

The Company collects, maintains and further processes your personal data which you either directly provide or have provided as prospective and / or existing clients / counterparties, in any capacity at all stages of your relation with the Company, or otherwise receives or becomes aware of from a third party, as well as from publicly accessible sources.

The Company processes each time only the personal data that are necessary for the relevant purpose of processing.

More specifically, the Company may collect and process the following personal data:

#### **2.1. Personal data collected through the corporate website:**

##### 2.1.1. Personal data collected through the Contact Form.

Through the contact form, you can contact the Company on any requests, questions, clarifications, complaints, etc. you may have, which are treated with the appropriate level of security and confidentiality. If you wish to use the specific service, you will be asked to fill in the relevant fields: name, surname, telephone number, address, city, postal code, email, as well as any personal information you decide to share along with your request by filling in the relevant field "Description".

#### 2.1.1.1 Purpose of Processing and Legal Basis.

The purpose of collecting and processing the aforementioned personal data is to communicate with you and provide you with the best possible services. The legal basis for the processing is the legitimate interest of the Company to provide high quality services to its customers and users of the Website.

#### 2.1.2. Personal data collected through the Property Proposal Form

Through the Property Proposal Form, you can make a proposal to the Company for a real estate purchase / sale and / or lease. In case you wish to use this specific service, you will be asked to fill in the relevant fields: the name, surname, telephone number, address, city, postal code, email, as well as to provide more information regarding the relevant property by filling in the relevant field "Description".

##### 2.1.2.1. Purpose of Processing and Legal Basis.

The purpose of the collection and processing of such personal data is the optimal service of the user, as well as of the Company for the completion and beneficial exploitation of its real estate portfolio. The legal basis of the processing is the legitimate interest of the Company to seek and make investments, as well as to use its real estate property in accordance with its statutory purpose.

#### 2.1.3. Personal data collected through the use of cookies.

When you browse the Website, Prodea Investments may collect only certain crucial information related to the Website traffic, such as the IP address, the type of browser used by the visitor, and cookies. For more information on the use of cookies on this Website, please read the [Prodea Investments Cookies Policy](#).

##### 2.1.3.1. Purpose of Processing and Legal Basis.

The purpose of collecting and processing this data is to improve the functionality and the efficiency of our website, the ability to specify our content, and to analyze our website traffic. We also share information about your use of our website to social media, advertising, and analytics media partners. The legal basis for processing for non- necessary cookies is the consent of the user which is provided with the explicit acceptance of these cookies, with the exception of the absolutely necessary cookies which are permanently installed and are absolutely necessary for the operation of the Website, for which the legal basis of the processing is the legitimate interest of the Company for the efficient operation of its website.

## **2.2. Personal Data collected by the Company in the context of its activities and performance of its operations**

### 2.2.1 Personal Data related to Board Members and Shareholders

The Company, in the context of its statutory structure and operation, collects and processes personal data related to the Members of its Board of Directors, as well as its Shareholders, which are necessary for the compliance of the Company with its legal and statutory obligations. In this context, the Company collects the following data: Name, Surname, Home address, Work address, Mobile phone, Home phone, Degrees / Qualifications, ID information / Passport details, Curriculum vitae, statements of absence of conflict of interest, personal data relating to criminal convictions and offences, tax clearance certificate, certificate of non-bankruptcy.

#### **2.2.1.1. Purpose of the Processing and Legal Basis**

The company collects and further process the aforementioned data in the context of the compliance of the Company with its statutory, regulatory and legal obligations, including its transparency obligations. The legal basis of the processing is the compliance with legal / regulatory obligations of the Company as well as the necessity for the corporate governance of its Group.

### 2.2.2. Personal Data related to suppliers, partners and other counterparties of the Company in the context of contractual relationships other than the purchase/sale and the lease of real estate property

The Company cooperates with third parties (suppliers / external partners) for its statutory purposes and its daily operational needs. In this context, the Company collects, indicatively, the following data: Name and Surname, Tax Identification Number, Bank Account Number (IBAN), social security registration number (AMKA), Tax Office, Telephone, Address, Work Address, E-mail, Hellenic Technical Chamber (TEE) registration number, Athens Bar Association number (DSA).

#### **2.2.2.1. Purpose of the Processing and Legal Basis**

The purpose of the processing is the collection and further processing of personal data in the context of the cooperation with a supplier (supplier opening). The legal basis of the processing is that the processing of data is necessary for the contract, as well as the legal interest of the Company for the support and execution of its crucial functions, the improvement of the operation and the fulfillment of the main purpose of its operation.



### 2.2.3. Personal Data related to property owners and / or tenants and / or participants in real estate tenders through the submission of bids

The Company collects and processes data of owners and / or tenants of real estate and / or participants in real estate tenders through the submission of bids, in the context of both the search and evaluation of investments, as well as the acquisition and subsequent use of real estate, according to its statutory purposes. These data include: Name (owner or natural representative of the owner / competent appraiser / tenant), the e-mail address (owner or representative of the owner, e.g. broker), Social Security Registration Number (AMKA.) (Owner / tenant of real estate property), Identity Card Number (ID number) (owner or natural representative of owner / competent appraiser / tenant), Tax Office (owner / tenant of real estate property), Address (owner or representative of the owner, e.g. broker), Telephone (owner or representative of the owner, e.g. broker / competent appraiser), tax / insurance certificates and financial data, as well as data on transaction behavior.

#### *2.2.3.1. Purpose of the Processing and Legal Basis*

The purpose of the processing is the collection and processing of personal data in the context of the search and evaluation of new investments (real estate purchase), the evaluation of real estate (new investment), periodic evaluations of real estate of the Company, the evaluation of the tenant's creditworthiness, management of legal issues and legal assistance, the acquisition of new real estate (legal / technical control), the assessment of the tenant's financial profile in the framework of the Company's regulatory obligations to conduct audits as so as to avoid money laundering and terrorist financing, as well as technical controls for the evaluation of investments. The processing of this data is mandatory to comply with legal obligations, as well as for the performance of the relevant contract, while the processing of this data may be carried out to the extent that is necessary for the legal interests of the Company and its regulatory obligations. (Fulfillment of main purpose of operation, defense of legal claims, support and performance of basic functions).

### 2.2.4 Personal data related to prospective employees

The Company collects and processes data of prospective employees upon submission of a relevant application of the candidate for hiring / filling a vacancy. In this case, the Company collects and processes only the personal information that is necessary to assess the suitability of the candidate for the specific job opening (e.g. name, surname, contact details, training, work experience / previous experience, etc.). We collect this data from the applications you submit by any means (e.g. e-mail, electronic platforms, the Company's website or in printed form when you presenting it to our offices or by fax), as



well as attachment documents to your application (e.g. CV, certificates, etc.). In addition, in the process of evaluating your application, we may ask you to complete further questionnaires or personality assessment tests in order to further evaluate your suitability for a particular job opening, which contain information about you.

#### *2.2.4.1 Purpose of the Processing and Legal Basis*

The personal data of the candidates is collected for the evaluation of their suitability for the vacancy that they submitted and expressed interest, but also for other possible service needs of Prodea Investments and its Group, as well as for you to keep track of the course of the recruitment process.

#### 2.2.5 Personal Data related to employees

The Company collects and processes personal information related to the employment relationship, as defined in the relevant employment contract. Indicatively, this data may include name, surname, date of birth, place of birth, gender, nationality, place of residence, e-mail address, telephone numbers, ID number, tax registration number, the social security registration number (AMKA), the bank account number, (IBAN), curriculum vitae, qualifications, information related to health, marital status and details of dependent family members, information related to the training and professional experience of the employee. Employees are informed about the collection and processing of their personal data through a dedicated *Notice on the Processing of Personal Data*.

#### *2.2.5.1 Purpose of the Processing and Legal Basis*

The collection of employees' data is done in order to manage the employment relationship, the execution of the terms of the employment contract, as well as the compliance of the Company with the legal and existing regulatory obligations in the field of employment and social security and social protection law.

### **3. Minors' Data**

The Company recognizes the need to protect the data of minors, as defined by the current regulatory framework. The Company retains information related to minors only if they have been provided by their legal guardians and only for the purposes of fulfilling a relevant transaction relationship for the benefit of minors. It is noted that in no case does the Company deal directly with minors, nor are the services provided by it intended for direct use by minors, and it only deals with their legal guardians.

- **To which recipients can your personal data be disclosed**

The Company may be obliged or entitled to disclose under regulatory or court decision or in the context of your transactional and contractual relationship with it, to third party recipients, natural or legal persons, public authorities, public services, or other bodies, for the achievement of their purposes and the performance of their duties, in accordance with the guarantees provided in the Existing Legislation.

In particular, in the context of achieving the processing objectives mentioned above, the following data may be transferred/ disclosed:

- i. To companies of the Prodea Group, in the context of providing their services for the fulfillment of a specific purpose of the Group.
- ii. To third party companies, which provide the Company with relevant services such as: Companies of digitization, maintenance and destruction of records, information systems services providers and support companies, market analysis/ promotion companies, Security companies, Consulting companies including financial advisors and auditors of the Company, Insurance companies, insurance brokers, insurance intermediaries in the provision of insurance products, real estate evaluators, real estate Brokers, Companies for the submission of declarations of the Company's real estate property rights in the cadastral or under cadaster areas, Insurance Agencies, Public Bodies, Chambers and Public Enterprises, Credit, Financial Institutions located in Greece or abroad, that have been licensed and operate legally. In any case, these companies are bound either contractually with the Company or under their relevant legal obligation and the obligation of confidentiality is ensured as well as all the obligations provided in the GDPR.
- iii. Union and National Supervisory, Judicial, Independent, and other Authorities for the fulfillment of the Company's obligation under law or regulation or court decision, such as: Hellenic Capital Market Commission, Hellenic Exchanges S.A., Hellenic Competition Commission, Special Secretariat for Financial and Economic Crime Unit (SDOE), Financial Police, National and Union's Public Authorities, Courts, Prosecutors, Investigating Officers, Notaries, Bailiffs, Mortgage Registries, Greek and Foreign Lawyers, Chartered Accountants and Audit Companies.

#### **4. What is provided for in the event of any transfer of your data to third countries (cross-border transfer)**

In the event that the transfer of data relates to a country outside the European Union (EU) or the European Economic Area (EEA), the Company shall assess whether:

- The European Commission has issued an adequacy decision for the third country to which the transfer will be made.
- The appropriate safeguards in accordance with EU regulation 2016/679 for the transmission of such data, are respected.

Otherwise, the transfer to a third country is prohibited and the company does not transfer any personal data, unless one of the specific derogations provided for in the Regulation applies (e.g. explicit consent of the data subject and provision of information on the risks involved in the transfer, the transfer is necessary for execution of a contract at the request of the data subject, there are reasons of public interest for the transfer, it is necessary to support legal claims and vital interests of the subjects, etc.).

#### **5. What is the retention period of your personal data**

In case of a contractual relationship with the Company, the Company will keep your personal data until the completion of the statutory period of general limitation of claims, i.e. for a period of up to twenty (20) years from the termination of the relevant contract in any way.

Until the expiration of the above period, if any legal actions are in progress with the Company or any connected company, that concern you directly or indirectly, the above retention period will be extended up to twenty (20) years from the adoption of an irrevocable judgment or the last procedural act.

In the event that no contractual relationship is established, your personal data will be kept for five (5) years from the time of their collection, in the context of the submission of the relevant application (by law limitation period of any claims based on non-contractual liability).

Where a shorter or longer period of retention period of personal data is provided for by law or regulatory acts, that retention period shall be reduced or increased accordingly.

Contractual documents bearing your signature, in which personal data have been registered, may, after five years, at the company's choice, be kept in electronic/digital form.

#### **6. What happens at the end of the retention period of your personal data**

In the event that the retention period of your personal data has expired, the Company pays special attention on the manner of destruction/deletion. More specifically, it has established a relevant procedure, which is applied when it is decided that the archived material is not required to comply with the legal and regulatory

requirements or to protect the interests of the Company, in accordance with the instructions of the Hellenic Data Protection Authority. The Company ensures that the aforementioned process of destruction of files containing personal data also binds third parties that provide services in the name and on behalf of the Company and any other persons with whom the Company cooperates as outsourcing contracts or other types of agreements.

#### **7. What are your rights regarding your personal data**

The Company ensures that data subjects can exercise the rights granted to them by national and Union legislation regarding the collection and processing of personal data, as defined by the Existing Legislation. In particular, each data subject has the right to:

- Request **access** to his/her personal data and request to receive a copy of his/her personal data kept and check the legality of such processing.
- Request the **rectification** of his/her personal data. It may request verification of the accuracy of the data held and, if found incomplete or inaccurate, provide corrected data.
- Request the **erasure** of his/her personal data and request that personal data be deleted or removed, if the retention of such data is not based on any legitimate basis or legitimate interest.
- Request **restriction of processing** of his/her personal data.
- Request the **portability/transfer** of his/her personal data to the data subject himself/herself and / or to third parties. In this case they will be provided to the data subject or to a third party who has selected his personal data in a structured, widely used, machine readable form. This right can be satisfied only in cases of automated processing.
- **Withdraw his/her consent** at any time, in cases where the processing of personal data is based on consent. In this case, however, the legality of the processing carried out before the withdrawal of the consent of the data subject is not affected.

In addition, the data subject is entitled to oppose the processing of his personal data, including opposition to automated decision-making and profiling.

In order to further facilitate the exercise of your rights, the Company has developed internal procedures in order to respond promptly and effectively to your relevant requests.

For the exercise of the above rights, please submit your request using the company's special form "[Application form for the exercise of rights of data subjects under the General Data Protection Regulation \(EU 2016/679\)](#)".

For matters relating to the processing of your personal data, you may apply in writing by physical correspondence to the Company or by electronic correspondence to the address [GDPR@prodea.gr](mailto:GDPR@prodea.gr).

The Company will make every possible effort to reply within thirty (30) days, from the submission of your request and your identification, which, however, may be extended for sixty (60) additional days, if this is required to serve the request, taking into account the complexity of the request and the number of requests.

The Company will inform you in any case of an extension of the period of thirty (30) days within thirty (30) days from the receipt of the request, as well as the reasons for the extension. If the Company does not act on your request, it shall inform you without delay within thirty (30) days of receipt of the request, of the reasons why it did not act and of the possibility of filing a complaint and bringing a legal action. The above service is provided free of charge. In the event, however, that your request is manifestly unfounded, excessive or repeated, the Company may either pass on the relevant costs, informing you accordingly, or refuse to respond to these requests.

In case of refusal of the Company or unreasonable delay in satisfying your requests during the exercise of your rights, you have the right to appeal to the Hellenic Data Protection Authority. Similarly, in case you consider that the protection of your personal data is affected in any way, you can appeal, if you wish, to the Hellenic Data Protection Authority, using the following contact details:

Website: [www.dpa.gr](http://www.dpa.gr)

Postal Address: 1-3, Kifisias Ave., P.C. 11523

Call Centre: +30 210 6475600

Fax: +30 210 6475628

E-mail: [contact@dpa.gr](mailto:contact@dpa.gr)

## **8. Which are the Company's obligations when processing your personal data**

### **A. Ensuring confidentiality and Security of processing**

The processing of personal data is confidential and is carried out exclusively by persons under the control of the Company. These persons are selected on the basis of strict criteria established by the Company and provide adequate guarantees in terms of knowledge and personal commitments for the observance of professional secrecy.

The Company takes the appropriate organizational and technical measures for the security of personal data and the protection of their integrity, such as accidental or illegal destruction, accidental loss, alteration, prohibited distribution or access and any other form of illegal processing. The measures the Company takes aim to ensure a level of security corresponding to the risks involved in the processing and the nature of the data processed.

However, it is stressed that no method of transmission via the Internet or method of electronic storage is 100% safe. However, all necessary measures of Digital Data Security (antivirus, firewall) are taken.

## **B. Information Systems Security**

The Company, in order to ensure the confidentiality of all information entered in its Information Systems, has established policies and manuals of Information Systems Security, under which:

- the protection of data moving through the networks used by the Company is ensured;
- the users' access to the Company's information systems is effectively controlled and the protection of the information that these systems manage is ensured;
- Security incidents of the Company's information systems are timely detected and prevented.

### **9. Installation of a video surveillance system for security reasons**

#### **10.1. Controller:**

The Controller is the Company "Prodea Real Estate Investment Company Société Anonyme", which is located in Athens, at Chrysospiliotisis 9 Street, P.C. 10560, phone number +30 213 3334000.

#### **10.2. Purpose of processing and legal basis**

We use a surveillance system for the purpose of protecting persons and property. Processing is necessary for the purposes of legitimate interests that we seek as controllers (Article 6 par. 1. (f) GDPR).

#### **10.3. Analysis of legal interests**

Our legitimate interest is the need to protect our offices and the goods found in them from illegal acts, such as theft, vandalism, malicious actions, etc. The same applies to the safety of life, physical integrity, health and property of our staff and third parties who are legally in the supervised area. We only collect image

data and restrict monitoring to places we assessed that there is an increased likelihood of committing illegal acts, (e.g. theft, robbery, malicious acts) such as at the entrances of our office building, without focusing on places where the privacy of the persons whose image is taken may be excessively restricted, including their right to respect personal data.

#### **10.4. Recipients**

The material maintained is accessible only by our competent / authorized personnel in charge of site security. This material shall not be forwarded to third parties, except in the following cases: (a) to the competent judicial, prosecuting and police authorities when it includes elements necessary for the investigation of an offence, which concerns persons or goods of the controller, (b) to the competent judicial, prosecuting and police authorities when requesting data, lawfully, in the exercise of their duties, and (c) to the victim or the perpetrator of a criminal act, when it comes to data which may constitute evidence of the act.

#### **10.5. Retention Period**

We keep the data for fifteen (15) days, after which they are automatically deleted. If during this time period, we identify an incident, we isolate part of the video and keep it up to one (1) month more, in order to investigate the incident and start legal proceedings to safeguard our legal interests; if the incident concerns a third party we will keep the video up to three (3) months more.

#### **10.6. Data Subjects' rights**

Data subjects have the following rights:

- Right to have access: you have the right to know if we are processing your image and, if so, to receive a copy of it.
- Right to restriction of processing: you have the right to ask us to restrict processing, such as not erasing data that you deem necessary to establish, exercise or support legal claims.
- Right to object: you have the right to object to the processing.
- Right to erasure: you have the right to request the erasure of your personal data.

You can exercise your rights by sending an e-mail to [GDPR@prodea.gr](mailto:GDPR@prodea.gr) or a letter to our postal address or by submitting the request to us in person, at our offices. In order to consider a request related to your image, you should tell us approximately when you were within range of the CCTV system and give us an



image of you as so as to help us locate your data and hide the data of third-party images. Otherwise, we give you the opportunity to come to our facilities as to display to you the images in which you appear. We also note that the exercise of the right of objection or erasure does not imply the immediate erasure of data or the modification of the processing. In any case, we will answer you in detail as soon as possible, within the deadlines set by the GDPR.

#### **10.7. Right to lodge a complaint**

In case you consider that the processing of the data concerning you violates Regulation (EU) 2016/679, you have the right to lodge a complaint to a supervisory authority.

Competent supervisory authority for Greece is the Data Protection Authority, 1-3, Kifisias Ave., P.C. 11523, Athens, <https://www.dpa.gr/>, phone number. 2106475600.

#### **11. Disclaimer for Third Party Websites**

The Website may provide links that redirect the user to third party websites. Prodea Investments does not control these third-party websites and is not responsible for the content posted on them or other links that appear on them. Prodea Investments is not responsible for the privacy practices of third parties or for the content of third-party websites.

#### **12. Update - Amendment of this Notice**

The Company may update, supplement and / or modify this Notice without warning, in accordance with the applicable regulatory and legislative framework. In this case, the updated Notice with a date indication, so that it is known which is the most recently updated version, will be posted on the Company's website ([www.prodea.gr](http://www.prodea.gr)) and will be available at the Company's principal establishment.

The above information is made pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council and the provisions of Greek legislation on the protection of personal data (Law 4624/2019 as it is in force) which are adopted and applied within this Regulation and replaces any previous information that has been made in the framework of Law 2472/1997 and may refer to contractual or other documents of the Company.

November 2020