1 Purpose and scope of the Policy

This Privacy Policy informs individuals (data subjects) about how the company «Christos Papacharalampous LTD» collects and processes personal data, the purposes and legal bases of the processing, the recipients to whom data may be disclosed, the retention period, the security measures, and the rights of data subjects under the General Data Protection Regulation (Regulation (EU) 2016/679 – GDPR).

The Policy applies when the company acts either as **a Data Controller** or as **a Data Processor**, depending on the relationship and the context of service provision.

2 Processing principles and accountability

The company processes personal data in accordance with the principles of the GDPR: lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality, and accountability. The company implements data protection practices from the design stage and by default (privacy by design & privacy by default), evaluating new or substantially modified processing operations before they are implemented.

3 Categories of data we may process

Depending on the relationship and the case, we may process:

- Identification and contact details (e.g., name, email, phone number).
- Billing/accounting support details (e.g., tax identification number/tax office, address, document details).
- Contractual relationship and communication details (e.g., correspondence content, requests/instructions).
- Technical access/security data, where applicable (e.g., login details, support activity logs, to the extent required for security and documentation purposes).
- Data processed in the context of customer services (as a Processor), as specified by the customer/Controller.

The company does not seek to process special categories of data, unless required by a specific relationship/mandate and with appropriate safeguards, in which case the relevant basis/purpose will be determined by the respective Data Controller and/or applicable law.

4 Purposes of processing and legal bases (as Data Controller)

When the company acts as a Data Controller, it processes personal data for specified, explicit, and legitimate purposes, which are determined prior to the start of processing and documented in accordance with the requirements of the General Data Protection Regulation. Processing is carried out only to the extent necessary to achieve the stated purposes and in accordance with the principles of minimization and purpose limitation.

In the course of its activities, the company processes personal data for the purposes of concluding, executing, and managing contractual and pre-contractual relationships, as well as for providing and supporting its services. This processing includes, among other things, communicating with customers

and partners, managing requests related to the services provided, and general business communication necessary for the operation of the company.

In addition, personal data is processed for invoicing, accounting monitoring, and tax compliance purposes, as well as for the fulfillment of other obligations arising from the applicable regulatory and legislative framework. This also includes the processing of data required to comply with lawful requests from competent administrative or judicial authorities.

In certain cases, the company may process personal data for legal support purposes, as well as for the establishment, exercise, or defense of legal claims. Such processing is carried out only to the extent necessary to protect the company's legitimate interests and in accordance with the provisions of the law.

The company also processes personal data for the purposes of ensuring information security, preventing and investigating security incidents, and protecting its systems, infrastructure, and information from unauthorized access or malicious actions. This processing is limited to the data that is strictly necessary and is carried out using appropriate organizational and technical measures.

The above processing is based, as appropriate, on the performance of a contract or the taking of pre-contractual measures, compliance with a legal obligation, the legitimate interest of the company, or the consent of the data subject, when required by law. In any case, the company ensures that there is a valid and appropriate legal basis for each processing operation and that no processing is carried out without a clear purpose and legal basis.

5 Processing as a Processor

When the company acts as a Processor, it processes personal data **only** in accordance with the documented instructions of the Controller and within the limits of the relevant contract. In the context of data analysis services, the company may obtain remote access to customer environments/databases and perform processing within the customer's environment. The company does not determine the purposes or legal basis of the processing (these are determined by the customer/Controller) and does not respond directly to subject requests, unless there is an explicit instruction or legal obligation to do so. If a subject request is received, the company informs the relevant Data Controller and cooperates to support the response.

6 Data recipients and transfers

The company may disclose personal data to third-party recipients only when necessary for the purpose of processing and there is a valid legal basis. Examples of recipients include professional advisors such as accountants and legal advisors, as well as competent public or judicial authorities when required by law or legal process.

For each transfer, the role of the recipient (e.g., processor, independent controller, authority), the legal basis, the purpose, and the appropriate safeguards are specified. Transfers are recorded in the company's relevant transfer/disclosure register.

7 Transfers outside the EEA

If data is transferred outside the European Economic Area, the company will ensure that the necessary GDPR safeguards (such as adequacy decisions or appropriate safeguards) are in place and will provide information where required. If no such transfers take place, the company does not transfer data outside the EEA in its capacity as a Data Controller.

8 Retention period

The company retains personal data only for as long as necessary to fulfill the purposes of processing and/or to comply with legal obligations. In particular, invoicing/accounting data is retained for the period required by the tax and accounting framework. Data related to contractual relationships are retained for the duration of the contract and for a reasonable period after its termination for the establishment, exercise, or defense of legal claims, where necessary. After the appropriate time has elapsed, the data is deleted or anonymized in a secure manner.

9 Security of processing

The company implements appropriate organizational and technical measures to protect data from unauthorized access, alteration, loss, or disclosure. The measures are selected according to the nature of the processing and are reinforced through the privacy by design & by default approach, in order to minimize access and the scope of processing by default.

10 Data subjects' rights and how to exercise them

When the company acts as a Data Controller, data subjects have the following rights, as applicable and in accordance with the GDPR:

Right to information and access: to be informed about the processing and to receive confirmation as to whether data concerning them are being processed, as well as access to them and related information.

Right to rectification: to request the rectification of inaccurate data and the completion of incomplete data.

Right to erasure ("right to be forgotten"): to request the erasure of data when, among other things, it is no longer necessary for the purposes, when consent is withdrawn (where this is the basis) or when there is a successful objection to processing, subject to legal obligations or public interest reasons that require retention.

Right to restriction of processing: to request restriction when the accuracy is contested, when the processing is unlawful but they do not want it erased, when the company no longer needs the data but it is required for legal claims, or when objections are pending.

Right to object: to object to processing based on legitimate interest, on grounds relating to their particular situation. The company will cease processing unless it can demonstrate compelling and legitimate reasons that override or are required for legal claims.

Right to portability: when processing is based on consent or contract and is carried out by automated means, to receive the data in a structured, commonly used and machine-readable format and to request its transmission to another controller, where technically feasible.

Right to withdraw consent: when consent is the legal basis, to withdraw it at any time. Withdrawal does not affect the lawfulness of processing before withdrawal.

Right to lodge a complaint: to lodge a complaint with the competent supervisory authority (in Greece: Hellenic Data Protection Authority) if they consider that their rights have been infringed.

11 How to exercise your rights

Requests to exercise rights should be sent to **chrpapach1@gmail.com**. The company may request reasonable evidence to verify identity in order to prevent unauthorized disclosure of data. The company will respond to requests within the deadlines set by the GDPR, unless there are reasons for a lawful extension, in which case the subject will be informed.

When the company acts as a Processor, requests from data subjects should normally be addressed to the relevant Controller. If the company receives such a request, it will inform the Controller and cooperate in accordance with their instructions.

12 Automated decision-making and profiling

Where the company implements automated decision-making and/or profiling processes that produce legal or similarly significant effects, the required information and appropriate safeguards will be provided in accordance with the GDPR. If no such processes exist, the company does not carry out automated decision-making with legal or similarly significant effects in its capacity as a Data Controller.

13 Policy Update

This Policy is reviewed when necessary, in particular in the event of changes to processing activities, transfers/recipients, or the applicable regulatory framework, in order to remain accurate and up to date.

14 Contact

For questions regarding this Policy or the processing of personal data, please contact **chrpapach1@gmail.com**.