	PERSONAL DATA PROTECTION POLICY		E.02.10
	VERSION 1	DATE: 01/11/2025	QUALITY AWARD

Circet Hellas considers the personal data protection as a matter of outmost seriousness and great importance. Respecting the personal data we collect and manage and ensuring their proper processing is one of the Company's priorities.

This is the reason why we take all appropriate technical and organizational measures in order to protect the personal data we process and to ensure that this processing will always meet the requirements of the current national and European legal framework for the protection of personal data (General Data Protection Regulation (EU) 2016/679, Greek Law 4624/2019, Directives, Decisions and Acts of the Hellenic Data Protection Authority and of the European Data Protection Board etc.).

1. DATA CONTROLLER – CONTACT DETAILS – DATA PROTECTION OFFICER

Circet Hellas is the Data Controller for all the personal data that collects, processes and stores.

Circet Hellas Single Member P.C. (Commercial Title: **Circet Hellas A.E.**)

Address: 68A Spaton Avenue, P.C. 15344, Gerkas Greece

Phone: (+30) 210-661 4855

Email: info@circet.gr

For the matters, concerning the processing of personal data you can contact the Company's Data Protection Officer (DPO) at dpo@circet.gr.


2. CATEGORIES OF PERSONAL DATA COLLECTED AND PROCESSED AND PURPOSES OF THE PROCESSING

A. If you are Customer of Circet Hellas

The main activity of Circet Hellas is the development and construction of telecommunications infrastructure. Its customers are the largest telecommunications providers. In order to ***execute and optimally serve the contracts we sign with our customers***, we collect and process **corporate** data (such as ***name, address, activity, VAT number & Tax Office***) and other information provided to us by our customers. In order to ***communicate seamlessly with them***, we collect and process personal data of our customers' employees, such as ***name, job title, business email address, contact telephone number and work address***.

B. If you are a Subscriber of a telecommunications service provider that collaborates with Circet Hellas

In the context of the execution of the business agreements that Circet Hellas has signed with its customers (telecommunications service providers), it is possible that we collect personal data of our customers' subscribers. These data (***name, address, contact number***) are communicated to Circet Hellas by the telecommunications providers, in order to ***carry out an on-site inspection*** before the start of the

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construction works. During the inspection, the subscribers' **signatures** are also collected, as well as **photographs of the buildings** (exterior and interior), without any identifying information.

For the processing of all the above-mentioned personal data in this paragraph, Circet Hellas acts as a Processor for its customers (telecommunications service providers).

C. If you Collaborate with Circet Hellas

In order to **explore our future cooperation** and to **facilitate our collaboration** (e.g. communication, project assignment, pricing, etc.) we collect and process communication and pricing data, such as **name, surname, brand name and/or distinctive title of the company you represent, business address, telephone number, e-mail, VAT number & Tax Office of your company**.

Moreover, we collect personal data of your employees (**name, job title, business email address, contact telephone number and work address**) for the purpose of **direct communication with them** on matters concerning our collaboration.

D. When you visit Circet Hellas' website (www.circet.gr)


Cookies are used each time you visit the Company's website. "Cookies" are small text files sent to your browser and stored in your computer for as long as your visit in the Company's website lasts. We use cookies in order to **ensure the website's proper operation and continuous improvement and to offer you the best service** through www.circet.gr . For more related information please read the Cookies Policy (<https://www.circet.gr/en/cookie-policy>) which is available in the Company's website.

You can find additional information on the processing of your personal data when using our website in the [Privacy Policy for the Use of the Website](https://www.circet.gr/en/privacy-policy), at <https://www.circet.gr/en/privacy-policy>.

E. When you use the contact form on the website of Circet Hellas (<https://www.circet.gr/en/contact-1>)

Every time you use the contact form of our website (or when you contact us via email) we collect the data you enter in the required fields (**company, full name, address, phone number, and email**) as well as any files/documents you may attach to your message, **in order to respond to your message**.

F. When you use the CV application form on the website of Circet Hellas (<https://www.circet.gr/en/career>)

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In case you send us your CV, we collect the information you enter in the relevant fields (**full name, e-mail, any information you provide us about your education and previous work experience, etc.**). We also save the **attached CV along with any annexes, in order to evaluate it** for a possible work position in the Company. We would like to inform you that we keep the CVs that we receive for a period of 1 year. If you would like your CV to be deleted earlier, please notify us at hrdep@circet.gr or at dpo@circet.gr.


G. When you visit Circet Hellas' premises

For the protection and security of the staff, visitors and properties, the Company operates closed video-surveillance circuit (CCTV) that records the images of clients, visitors and employees in public areas (where permitted by law). The recording is done always in accordance with the relevant legislation. You can find detailed information regarding the processing of the image data through the CCTV operating in the Company in the [CCTV Policy](https://www.circet.gr/greek/user_upload/pdf/E02.13_INFORMATION_ABOUT_THE_PERSONAL_DATA_PROCESSING_BY_CLOSED_VIDEO_SURVEILLANCE_CIRCUIT_CCTV.pdf), which is uploaded to our website ([https://www.circet.gr/greek/user_upload/pdf/E02.13 INFORMATION ABOUT THE PERSONAL DATA PROCESSING BY CLOSED VIDEO SURVEILLANCE CIRCUIT CCTV .pdf](https://www.circet.gr/greek/user_upload/pdf/E02.13_INFORMATION_ABOUT_THE_PERSONAL_DATA_PROCESSING_BY_CLOSED_VIDEO_SURVEILLANCE_CIRCUIT_CCTV.pdf)).

3. LEGAL BASIS OF THE PROCESSING

Legal basis of the data processing may be:

- i. The **performance of a contract** between **Circet Hellas** and its customers/business partners (according to the article **6§1-b** of the General Data Protection Regulation). **Without collecting and using the necessary information it will not be possible to sign and/or serve our business agreements.**
- ii. **Circet Hellas' compliance with its legal and regulatory obligations**, arising by the current legal framework regarding the Company's business activities (according to the article **6§1-c** of the General Data Protection Regulation).
- iii. The **preservation and protection of the legitimate interests** (according to the article **6§1-f** of the General Data Protection Regulation) of both **Circet Hellas** and its customers/business partners, if necessary. Legitimate interests include, inter alia, the support of legitimate claims or the defend of our rights and interests before court the development and improvement of the services provided by the Company, as well as its uninterrupted and continuously improving operation.
- iv. Your explicit **consent** (according to the article **6§1-a** of the General Data Protection Regulation) that you may provide us for specific processing purposes (e.g. when you send us your CV).

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4. RECIPIENTS OF THE PERSONAL DATA

First, the authorized personnel of **Circet Hellas** have access to your data, as part of their duties, according to their job description.

Your personal data may be transferred to third party business partners of **Circet Hellas**, such as, for example, our subcontractors who perform construction works on our behalf, always subject to confidentiality in all cases

The data will be disclosed only if it is necessary for the processing purposes.

Moreover, your data may be disclosed –as required or/and permitted by the applicable laws– to **public authorities and bodies** and courts, in order that the Company comply with its legal (legislative, regulatory, judicial decisions) or contractual obligations.


5. TIME PERIOD OF STORAGE OF THE PERSONAL DATA

In principle, we store the data for at least ***as long as it is necessary to fulfill the processing purposes*** for which it was collected.

In addition, we store the data for ***as long as it required by the overall legislative framework*** that defines the Company's business operations.

Specifically:

- i. Personal data that serves the conclusion or execution of a contract are stored for as long as it is necessary for the execution of the contract and the establishment, exercise and/or support of any legal claims that may arise from this contract.
- ii. When the processing of data is based on the preservation and protection of the legitimate interests of the Company or a third party, the data is stored for as long as it is necessary to satisfy such legitimate interests.
- iii. If the processing of your data is based on your consent, your personal data will be kept until you withdraw your consent. It should be clarified that the withdrawal of the consent does not affect the lawfulness of the processing based on the consent while it was in force.
- iv. The data collected and processed through the contact form on the Company's website are kept until the message is answered.
- v. The data collected and processed through the CCTV (image data), are stored for 14 days and then they are automatically deleted.

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6. RIGHTS IN RELATION TO YOUR PERSONAL DATA

- **Right of access**

You have the right to know what categories of personal data of yours we keep and process, for what processing purposes and other additional relevant information. You also have the right to request a copy of your personal data undergoing processing.

- **Right to rectification**

You have the right to request the rectification, modification and completion of your personal data.

- **Right to erasure («right to be forgotten»)**

You have the right to request the erasure of your personal data when they are processed based on your specific consent. In cases where the processing is based on another legal basis (such as performance of a contract, legal obligation or protection of legitimate interests of the Company etc.), this right of yours may be subject to restrictions or not be exercised.

- **Right to restriction of processing**

You have the right to request the restriction of processing of your personal data

- When their accuracy is contested by you and until we make their relevant verification
- Alternatively, instead of their erasure
- When they are no longer necessary for the processing purposes for which we have collected them, but they are required by you for the establishment, exercise or defence of legal claims
- When you object to their processing and until it is verified that there are legitimate reasons for such processing by the Company

- **Right to object and automated individual decision-making including profiling**


You have the right to object to the processing of your personal data when it is based on a legitimate interest, as well as for direct marketing and profiling purposes

- **Right to data portability**

You have the right to request and receive your personal data in a format that allows you to access them, use them and process them with the commonly used editing methods. In addition, you have the right to request us to transmit your personal data to another controller where we process them by automated means and based on your consent or for the performance of a contract and if this is technically feasible.

- **Right to withdrawal of consent**

If the processing of your personal data is based on your consent, you have the right to withdraw it at any time. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal.

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You may exercise your above-mentioned rights as well as pose any question, complaint or ask other information regarding the processing of your personal data, by contacting dpo@circet.gr or the contact information mentioned in paragraph 1.

7. RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY

You have the right to lodge a complaint with the Hellenic Data Protection Authority (www.dpa.gr) on matters concerning the processing of your personal data.

8. PROTECTION OF PERSONAL DATA

Circet Hellas ensures the lawful collection and processing of the personal data. The Company applies all appropriate technical and organizational measures to ensure the protection of the personal data it processes against accidental or unlawful loss, destruction, falsification, prohibited dissemination or unauthorized access to them.

9. LAST UPDATE

This policy may be periodically updated.
This current version is effective since 01.11.2025

Managing Director

Dimitrios Roussos

