



## Privacy Policy

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## 1. Introduction

For MINERVA, the privacy and security of the Users and Visitors of our website, as well as our Consumers and External Associates, is of utmost importance. MINERVA is committed to protecting the personal data you share with us. This privacy policy covers the ways in which MINERVA processes information that may be used to directly or indirectly identify an individual ("Personal Data") and is collected through the use of MINERVA's website.

Our website complies with 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 ("GDPR"), which is a directly binding legislative act. The GDPR creates certain new rights for individuals and reinforces some of the rights already existing under Directive 95/46/EC.

The terms of this policy apply to:

**Visitors**, i.e. the persons who visit our website (<http://www.minerva.com.gr>), **Consumers**, i.e. any natural person to whom MINERVA products are directed, **Prospective Employees** of MINERVA, as well as its **External Associates**, i.e. persons cooperating with MINERVA.

Any processing of personal data carried out by MINERVA is done in such a way as to ensure its confidentiality. All information is stored securely and only authorized personnel can access it. MINERVA implements and develops the necessary technical and organizational measures to protect the Personal Data of Users/Visitors, Consumers, and External Associates (all of whom are referred to as "Data Subjects") against unauthorised or unlawful processing and use, and against potential loss, destruction, damage, theft or unlawful access.

## 2. Collection and use of personal data

### 2.1. General Information

#### 2.1.1. Legal basis for use of your personal data

MINERVA collects only the personal data necessary to satisfy your requests. Where additional, optional information is sought, you will be informed at the time of collection of such data and your prior consent may be required for processing.

The current legal framework allows us to process personal data only if we have the legal basis to do so. Furthermore, we are required to inform you of these grounds for processing. Therefore, when we process your personal data we rely on one of the following processing bases:

**Consent:** Your consent may be requested occasionally so that we can process some of your personal data. Such data will only be processed in this way with your express consent [Article 6(1)(a) of the GDPR].

**Performance of contract:** Where the processing of your personal data is necessary for the fulfilment of our obligations under a contract entered into between us [Article 6(1)(b) of the GDPR].

**Legal obligation:** This is where we are required to process your personal data in order to comply with a legal obligation, such as: a) keeping records for tax purposes; b) providing information to a public body; c) complying with the requirements of a law or regulation or a court judgment [Article 6(1)(c) of the GDPR].

**Protection of your vital interests:** This applies to cases where the processing of your personal data is necessary to protect your vital interests [Article 6(1)(d) of the GDPR].

**Performance of a task carried out in the public interest or in the exercise of official authority:** This applies to cases where the processing of your personal data is necessary for the performance of a task carried out in the public interest [Article 6(1)(e) of the GDPR].

**Legitimate interests:** We may process your personal data in cases where such processing is in the legitimate interests of our company when performing a lawful activity in order to ensure the continuity of that activity. Such processing shall, of course, not override your interests or fundamental rights and freedoms [Article 6(1)(f) of the GDPR].

MINERVA collects special categories of personal data, as defined in Article 9 of the GDPR, when natural persons provide us with such data themselves, without being requested to do so by us or when such data is required or their collection is allowed by law.

The concept of 'special categories' of personal data includes personal data relating to a person's race, nationality, political opinions, trade union membership, religious beliefs, philosophical beliefs, physical or mental health, sex life and orientation, criminal convictions and offenses.

### 2.1.2 Collection of data

MINERVA collects the personal data of Data Subjects through our Consumer call center as well as through our website.

The following sections cover the Data Subjects whose personal data are collected.

MINERVA may collect and process the personal data of Website Visitors, Consumers, Prospective Employees.

If required by the applicable legal framework, we will ask for your express consent for the processing of your personal data as collected by MINERVA.

Please note that your consent is completely optional. However, unless you provide us the necessary consent to process your Personal Data whenever such consent is requested, you may not be able to use these services.

*The personal data processed by MINERVA is the following:*

**Website Visitor data:** IP Addresses, cookies.

**When signing up for our newsletter:** email, full name.

**Personal data of Survey Participants:** Full name, home address, landline phone number, mobile phone number, email address, age, marital status.

**Personal data of Prospective Employees:** Full name, landline or mobile phone number, email address, CV.

**Wholesaler personal data (natural persons):** Full name, registered address, landline phone number, mobile phone number, VAT number, Tax Office, email address.

MINERVA shall not retain the data of the Data Subjects beyond the time necessary for the fulfilment of the purposes for which they were collected or as required by the applicable legal framework.

MINERVA shall take all possible measures to ensure that your data is treated securely, as within the EU/EEA, and in accordance with this Privacy Policy and applicable law. Furthermore, MINERVA shall update its current Policy to cover cross-border data transfers and the relevant privacy safeguards for platform Users.

MINERVA collects aggregated data relating to its Website traffic, including the number of Visitors and visits, geographic location data, time spent on the website, and the number of clicks on its links.

### 2.1.3 Purpose of personal data processing

MINERVA uses the data collected for the following purposes:

i) **As regards Website Visitors**, personal data is provided through the communication form; the purpose of such data collection is keeping you updated regarding MINERVA offers and news, the improvement of the website and the adjustment of the way Visitors navigate through it. Therefore, as regards the provision of such data the Website Visitor gives consent by entering the relevant information, and failure to provide it may affect the outcome of the Visitor's requests or may render them unfulfillable. Furthermore, the Visitor will not be able to receive MINERVA offers and news. As regards the improvement of the website and the adjustment of the way visitors navigate through it, please check our [Cookies Policy](#). As Controller and for the above purposes, MINERVA processes personal data such as: your full name, IP address, email address.

In order to receive information via Newsletter, Website Visitors provide their explicit consent through a special field on the website. When you register we will ask for your email and full name.

Should you choose to not provide consent for the above processing purposes, we will not send you our Newsletter. We further inform you that you may withdraw your consent at any time and free of charge.

ii) **As regards Prospective Employees**, personal data is provided for the evaluation of such prospective employees and the recruitment process. Such processing is a legitimate interest of MINERVA and is aimed at the company's best possible staffing. As Controller and for the above purposes, MINERVA processes the following

personal data: Full name, landline or mobile phone number, email address, CV and supporting documents (e.g. formal qualifications).

iii) **As regards External Associates**, the provision of personal data for their payment for the provision of services/goods, as well as the management of supplier contracts, is a contractual obligation and failure to provide such data will affect the proper performance of the contract. As Controller and for the above purposes, MINERVA processes personal data such as: full name, home address, ID Card No., VAT number, Tax Office, landline phone number, mobile phone number and email address.

Furthermore, MINERVA may process personal data where such processing is necessary for the purposes of the legitimate interests it pursues, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data.

The following table contains the personal data processing activities carried out by MINERVA with respect to Data Subjects, as well as the purpose and the legal basis on which the following activities are based:

<b>Data Subject</b>	<b>Processing Activities</b>	<b>Purpose</b>	<b>Legal Basis</b>
Website Visitors	Communication with Customers through the contact form on the Website	Communication with Customers for the fulfilment of requests and the provision of clarifications or information regarding offers and news relating to MINERVA (newsletter)	Consent
Website Visitors	Collection of Visitor data (IP address)	Display of advertisements, improvement of the Website and adjustment of the way Visitors navigate through it	Consent
Survey Participants	Collection of personal identifiers and contact information of Survey Participants	Conduct of Surveys for the provision of MINERVA services. Surveys regarding the quality of MINERVA's services.	Consent
Wholesalers/Retailers	Collection of personal identifiers, financial and tax information, contact details	Conclusion of contracts	Performance of Contract
Wholesalers/Retailers	Processing of personal data of wholesalers – natural persons - for invoicing purposes	Invoicing	Performance of Contract
Consumers	Processing of Personal Data of Consumers as part of Promotions	Provision of offers	Legitimate interest
Wholesalers/Retailers	Access to personal data of wholesalers/retailers - natural persons - as part of information system support activities	Solving of Company IT issues	Legitimate interest of the Company for the smooth conduct of systemic processes that support MINERVA's business processes, for its smooth operation
Prospective Employees	Collection, processing, storage of personal data of prospective employees through CVs and completed forms	Prospective employee assessment	MINERVA's legitimate interest in finding new employees for the best possible staffing of the Company

### **2.2.1 Use of Website**

By visiting MINERVA's Website, you consent to the collection and use of your Personal Data as described in this Policy.

If you do not agree with the terms set forth herein, please do not continue browsing our Website.

MINERVA can collect, record and process the data of Website Visitors. We may record your IP address and use cookies as set out below.

MINERVA can add information collected through page view activity. Furthermore, MINERVA may collect and process any Personal Data you voluntarily provide to us on our Website forms, e.g. when you sign up for information and newsletters.

### **2.2.2. Cookies**

Cookies are small text files that are stored on the browser when you browse the web. Their purpose is to notify the website the user is visiting of their previous activity. Cookies are not used to run programs or install viruses on your computer.

By continuing to use MINERVA's website, you agree to the placement of cookies on your device. If you choose not to accept our cookies, we cannot guarantee that your browsing experience on the website will be satisfactory.

We may also place third-party cookies for operational and marketing purposes. The use of cookies is widespread and benefits the Visitor. For more information, see MINERVA's [Cookies Policy](#).

### **2.2.3. IP Addresses**

The Internet Protocol (IP) address is a unique number devices use to recognise and communicate with each other in a computer network using the Internet Protocol Standard. An IP address is therefore a number assigned to your computer each time you access the Internet. It allows computers and servers to be identified and communicate with one another. Any IP addresses that seem to correspond to Visitors may be recorded for IT security reasons and system identification purposes. This data may also be used in consolidated format for trend/website performance analysis purposes.

### **2.2.4. Links to other websites**

Please note that when you visit our Website, you can follow links to other websites not controlled by us. MINERVA is not responsible for the content or privacy policy of these websites.

### **2.3.1 Collection of data of Users participating in surveys**

Surveys used to collect User-generated data are made available to relevant businesses, organizations, and individuals. MINERVA is responsible for ensuring that data is collected and processed in accordance with applicable law. MINERVA shall not process Personal Data for purposes or by means other than those ordered by Website Users.

Surveys or questionnaires concern persons whose data has been manually downloaded, transferred or entered by the User of MINERVA's Website into their account for the improvement of the services provided to the User. Personal data may include personal contact information such as: name, home address, landline or mobile phone number, email address, information regarding family, lifestyle and social circumstances such as age, date of birth, marital status, number of children, qualifications, gender, religion, race, health information and other sensitive personal data.

**Special note for minors:** Minors under fifteen (15) years of age are forbidden from disclosing their personal data to MINERVA through its Website without the prior consent of their guardian. **We ask such persons to not provide information to us.** If Website Visitors fall into the above category and continue to disclose their personal information through our Website, MINERVA shall assume that such persons have obtained the prior consent of their guardian.

### **2.3.2. Place of collection and processing of personal data**

The Personal Data collected by MINERVA is collected, stored and processed at the company's registered office in Metamorphosi, Attica, at 165 Tatoiou Str. & Odysseos Str., as well as at the registered offices of the company's server administrators. Furthermore, platforms are used by newsletter service providers.

### 3. Retention and erasure

MINERVA shall **not** retain data for longer than necessary for the fulfilment of the purposes for which they were collected or as required by the applicable legal framework. In some cases, specific personal information may be retained for longer, due to possible legal obligations, legitimate interests, etc. of MINERVA.

### 4. Acceptance of these terms

We assume that all Visitors of MINERVA's Website have read this Privacy Policy carefully and agree with its contents. If someone disagrees with this privacy policy, they should not use our website and platform. MINERVA reserves the right to amend the privacy policy according to its needs.

### 5. Rights of Data Subjects

The new GDPR provides you the following rights with respect to the processing of your personal data:

**Right of access:** You have a right to request access to your personal data. This enables you to receive a copy of your personal data held by MINERVA.

**Right to Rectification:** You have a right to request the rectification of your personal data. This enables you to correct any incomplete or inaccurate data held by MINERVA. In this case, we will need to verify the accuracy of the new data you provide.

**Right to Erasure:** You have a right to request the erasure of your personal data. This enables you to request that we erase or remove personal data if there is no reason for us to continue processing it. Please note, however, that exercising this right may in certain cases not be possible for specific legal reasons that will be communicated to you, as appropriate, at the time of your request.

**Right to Restriction of Processing:** You have a right to request the restriction of processing of your personal data. More specifically, you may request that we stop processing of your personal data in the following situations:

- (a) if you want us to redefine the accuracy of your personal information,
- (b) if you believe that the use of your data is abusive, but you do not want us to delete your data,
- (c) when we need to retain your data, even if we no longer require them, so that you can use them if you have to exercise certain rights.

**Right to Object:** You may object to the processing of your personal data at any time in cases where the processing of your data is based on the performance of a task carried out in the public interest or in the exercise of official authority [case referred to in Article 6(1)(e) of the Regulation] or if processing is necessary for the purposes of the legitimate interests pursued by MINERVA or a third party [case referred to in Article 6(1)(f) of the Regulation]. However, MINERVA is entitled to not satisfy your right in so far as it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

**Right to Data Portability:** You have a right to request the transfer of your personal data to yourself or third parties. We will provide your personal data to you or the third party you have indicated in a widely used, readable electronic format. Please note that this right applies only to automated information that you initially provided consent for us to use, or where we need the information to perform a contract with you.

**Right to Withdraw Consent:** You may withdraw your consent at any time in cases where you have already given your consent to the processing of your personal data. However, this shall not affect the legality of any processing that took place before your consent was withdrawn. If you withdraw your consent, MINERVA may not be able to offer you some of its products or services. You will be informed accordingly at the time of your request.

**Manual decision-making:** Automatic decision making occurs when an electronic system uses personal information to make a decision without human intervention. In this case you have the right to not be subject to decisions made solely on the basis of automated processing, including profiling with legal effects that concern you or significantly affect you in a similar manner, unless you provide consent or if this is necessary for the conclusion or execution of a contract between us or if otherwise permitted by law. You also have the right to challenge decisions made about you with the above procedure.

If you wish to exercise any of the above rights, please contact the following phone numbers: 8001128282/2102854220 or email address: info@minerva.com.gr

Furthermore, we inform you that you have the right to lodge a complaint with the competent Personal Data Protection Authority if you consider that the processing of your personal data by MINERVA infringes your rights.

## **6. Legal obligation to disclose personal data**

We may only disclose the User's personal information without his or her prior consent, if we have reason to believe that the disclosure of such data is required to identify, communicate with or initiate legal proceedings against a person or persons suspected of having violated or jeopardized assets belonging to MINERVA or other persons who could be harmed by the activities of such Users or by persons who could (intentionally or otherwise) commit such acts. Obviously, such disclosure will be in accordance with the criteria and conditions laid down by law.

## **7. Access to and updating of your personal data**

MINERVA shall provide you with access to your personal data, and in case this data is incorrect, we will provide you with ways to update or erase your data quickly. Where MINERVA has to retain some or all of this information for lawful business purposes or if it has a legal obligation to do so, such information will not be erased for as long as they serve such purpose.

We aim to provide our services in a way that protects your data from accidental or malicious destruction.

## **8. How do we protect your personal data?**

The processing of personal data is conducted in such a way as to ensure its confidentiality. Specifically, it is carried out exclusively by personnel specifically authorized to do so, taking all organisational and technical measures to secure and protect data against accidental or unlawful destruction, accidental loss, alteration, unauthorised disclosure or access or any unauthorised form of processing.

All personnel are subject to confidentiality obligations, and all MINERVA personal data Processors, as well as sub-processors are required to sign a confidentiality and GDPR compliance agreement.

Devices on which personal data are stored are always locked in a secure location, except when not in use or when they are being transported. Personal data are never stored on mobile media storage devices such as USBs, CDs and DVDs.

MINERVA will keep you informed at all times regarding changes to our privacy and security procedures, including company practices and policies. You can request information regarding where and how your data are stored, secured, and used at any time.

MINERVA trains and informs all company personnel regarding data security measures as set forth in this Privacy Policy.

In the case of a personal data breach, MINERVA shall notify you and the competent Supervisory Authority within 72 hours by email or other appropriate means, providing information on the extent of the violation and the data affected. Furthermore, it shall obviously take any measures required to limit any adverse effects on the data subjects.

## **9. Recipients**

The personal data we collect may be transferred to third parties, provided that such transfer is legally justified.

Furthermore, once we obtain your consent, your personal data may be disclosed to the following categories of recipients:

**A. External Associates that MINERVA cooperates with:**

- i. For the provision of instant mail services.
- ii. For the provision of invoice printing services.
- iii. For the provision of telephone services.
- iv. For brokering services for the promotion of MINERVA's products and services.
- v. For the performance of tasks and the provision of IT systems services.
- vi. Rating agencies.
- vii. Promotion companies.

**B. Banks**

**C.** Any competent supervisory, public or judicial authority where this is required by the applicable legal framework or by court judgment.

**10. Changes to the Privacy Policy**

Our aim is to review and continually update this Privacy Policy in order to comply with applicable legislative and regulatory requirements, while providing the best possible protection of your personal data. You will be notified of any updates through this Website.

If you require more information or clarifications on the data collected by MINERVA or how it is processed, please contact the following numbers: 8001128282/2102854220 or email address: [info@minerva.com.gr](mailto:info@minerva.com.gr)