

## **PRIVACY POLICY**

### **General**

The Company under the name **VCLAVIS G.P.** and business name VCLAVIS, based in Thessaloniki, st. Veroias 5, P.C. 54625 VAT number 802629475 and No. GEMI 179864706000, which retains the right to exploit and manage the VCLAVIS software, is responsible for the processing of personal data in the context of the services provided on the website [www.vclavis.com](http://www.vclavis.com), as well as the use of the VCLAVIS software. It recognizes the importance of protecting your personal data and respects your privacy. It applies the relevant EU and national legal framework for the protection of personal data, and the General Data Protection Regulation (EU) 2016/679.

Our Company collects only the necessary personal data for the reason why it is collected and applies appropriate technical and organizational measures to ensure an appropriate level of security.

At the time your personal information is collected, our Company informs you of the reason why they are collected, for the duration of their processing, for any addressees, for their transfer to a country outside the European Union and for your relevant rights against our Company.

Nevertheless, in order to provide the above briefing in a concise, understandable, transparent and easily accessible form, we have drafted this policy, which includes general information. Please read this policy carefully.

This privacy policy will be reviewed in case of changes in our Company's activity or legislation. Updating of this review will be through this website.

### **Personal data collected, purpose and legal basis of the collection**

Our Company processes and specifically receives, maintains and uses the following categories of personal data:

**Your contact details** (name, telephone, email, etc.). This data is received by you upon your request to contact you. The legal basis of the processing is your consent and our legitimate interest in better understanding your needs and expectations and, consequently, improving our products and services.

**Your identity and financial data** (name, email, VAT number, address, profession, bank account details, bank card details, financial data, etc.). These data are received by you, as you declare, in order to conclude the contract between us, to execute and support it, to communicate with you and to issue the required tax returns. The legal basis for processing is the performance of the contract, compliance

with tax laws or other applicable legislation or the fulfillment of our duty, such as complying with a court order, with directives, demands or decisions by the Public Authority, and our legitimate interest in the handling and handling of legal or extrajudicial disputes between us.

**Your contact data** (email and mobile phone). These data are obtained at your request to send informative and promotional material for our services (newsletter, sms, viber). The legal basis for processing is your consent.

**Login - customer identification data** (password to your account and email). These data are obtained from you in order to provide our services to you. The previously entered data by you can be modified by you. For security reasons, the company recommends complex passwords of at least 12 characters consisting of uppercase, lowercase, numbers and special characters and secrecy on your part. The legal basis for the processing is the performance of the contract and our legitimate interest in security in the provision of the services.

**Data usage statistics.** This data relates to software usage statistics, such as date of registration, hours of service usage per day or week, etc. The legal basis of the processing is the performance of the contract and our legitimate interest in providing you with a better service.

**Connection data (Internet identifier).** Our company when browsing our site uses cookies. For more information visit: <https://www.vclavis.com/cookies/>

The legal basis of processing is our legitimate interest in promoting our services.

When connecting to a Company's social networking account or engaging in an activity, e.g. a statement that you like or share, our company has access to your social networking identity and related information. This access is defined by the mechanisms of applications and services of social networking services, in accordance with their own privacy policy.

Our site from time to time contains links to and from third party websites. We note that these third party websites have their own privacy policy, independent of ours for which we bear no responsibility. We point out that the link - file data are entered by you on your own initiative, choice and responsibility.

### **Categories of Recipients of Personal Data**

In fulfilling our Company's contractual and legal obligations, performing a duty, serving its legitimate interests and in the event that the Company has obtained your consent, the recipients of the data

relate to the following categories, depending on the services we have undertaken to offer you:

**External affiliates of the company** (accountants, courier companies, service providers on our behalf, such as newsletter, payment services provided by credit cards, marketing services, website hosting, support and management services, lawyers/legal advisors, etc.), who process on our behalf in accordance with the law on the protection of personal data.

**Servers** located within the European Union in a completely secure environment, which are under a due regulatory obligation of confidentiality.

**Public authorities ( Tax office, Independent Public Revenue Authority, Ministries etc.),** in order to comply with the law, a court order, their instructions, requests or decisions.

**Judicial and prosecutorial authorities** in case of claims or criminal offences.

Payments are made through a secure environment by a partnering financial institution.

#### **Time Period for keeping Personal Data**

<b>TYPE OF PROCESSING</b>	<b>DURATION OF COMPLIANCE</b>
Contact Request	6 months after processing the request
Invoicing document	Under current tax law
Identity Data	5 years from the deletion of the account
Newsletter service - information via sms	Until receipt of deletion request
Login data (password)	Up to 2 years after deletion of the account
Subscription data	Until account deletion
Connection with Social Media Account	According to the social media service's policy

In the event of a shorter or longer period for keeping personal data required by law, the duration is reduced or increased accordingly. If, until the expiration of the above period, claims arise or are identified to be criminal offenses, otherwise judicial proceedings are in progress, the relevant term is extended until a final judgment is issued.

### **Personal Data of Children**

Our services through our website and the website do not intended for children under the age of majority. Our Company does not knowingly collect information or personal data from children. If we understand that we are processing a child under 18 without the valid consent of a parent or guardian, we will delete the relevant data.

### **Your Rights**

According to the General Data Protection Regulation (EU 2016/679), you have the right to file a complaint with the competent authority (the Personal Data Protection Authority, Ave. Kifissia Street 1-3, P.C. 115 23, Athens, tel. 210 6475600, e-mail: [contact@dpa.gr](mailto:contact@dpa.gr)).

According to the same Regulation you have the right to access, correct, delete, restrict or oppose the processing and portability of the personal data collected by our company. In particular, you have the right to confirm whether or not your personal data is being processed and whether or not you have access to relevant information and, where appropriate, requesting limitation of processing. You have the right to correct inaccurate or complete incomplete personal data by submitting any necessary documents that indicate the need for correction or completion.

You have the right to request the removal of personal data on a case-by-case basis, provided that our company has no legitimate or valid reason to keep this data. You have the right to object to the processing of your personal data on a case-by-case basis and, on a case-by-case basis, to receive your personal data in a structured, commonly used and machine readable format or to request transmission to a third party.

In order to exercise your rights you can apply in writing by e-mail to [info@vclavis.com](mailto:info@vclavis.com)

In order to handle your requests, we are entitled to request verification of your identity. The exercise of these rights acts for the future and not for any processing already performed.

Last updated on December 2024