



# Website Privacy Policy

## General Information

Website Privacy Policy	
<b>Project :</b>	Website Privacy Policy
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## Version History

Version	Date	Description	Author
1.0	08/06/2022	Creation	Kosmas Konstantinidis

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## Table of Contents

<b>1.</b>	<b>PRIVACY NOTICE</b>	<b>3</b>
<b>2.</b>	<b>SUMMARY OF KEY POINTS</b>	<b>3</b>
<b>3.</b>	<b>WHAT INFORMATION DO WE COLLECT?</b>	<b>5</b>
3.1	Personal Information you Disclose to us	5
3.2	Information Automatically Collected	5
3.3	Information collected from other sources	6
<b>4.</b>	<b>HOW DO WE PROCESS YOUR INFORMATION?</b>	<b>7</b>
<b>5.</b>	<b>WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?</b>	<b>8</b>
<b>6.</b>	<b>WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?</b>	<b>9</b>
<b>7.</b>	<b>WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?</b>	<b>10</b>
<b>8.</b>	<b>DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?</b>	<b>10</b>
<b>9.</b>	<b>IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?</b>	<b>11</b>
<b>10.</b>	<b>HOW LONG DO WE KEEP YOUR INFORMATION?</b>	<b>11</b>
<b>11.</b>	<b>HOW DO WE KEEP YOUR INFORMATION SAFE?</b>	<b>11</b>
<b>12.</b>	<b>DO WE COLLECT INFORMATION FROM MINORS?</b>	<b>12</b>
<b>13.</b>	<b>WHAT ARE YOUR PRIVACY RIGHTS?</b>	<b>12</b>
13.1	Account Information	13
<b>14.</b>	<b>CONTROLS FOR DO-NOT-TRACK FEATURES</b>	<b>14</b>
<b>15.</b>	<b>DO WE MAKE UPDATES TO THIS NOTICE?</b>	<b>14</b>
<b>16.</b>	<b>HOW CAN YOU CONTACT US ABOUT THIS NOTICE?</b>	<b>15</b>
<b>17.</b>	<b>HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?</b>	<b>15</b>

## 1. PRIVACY NOTICE

This privacy notice for Comsys S.A. (“**Company**,” “**we**,” “**us**,” or “**our**”) describes how and why we might collect, store, use, and/or share (“**process**”) your information when you use our services (“**Services**”), such as when you:

- Visit our website at [www.comsyscx.com](http://www.comsyscx.com) or any website of ours that links to this privacy notice
- Engage with us in other related ways — including any sales, marketing, or events

**Questions or concerns?** Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our services. If you still have any questions or concerns, please contact us at [DPO@comsyscx.com](mailto:DPO@comsyscx.com).

## 2. SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find more details about any of these topics by using our table of contents below to find the section you are looking for.

**What personal information do we process?** When you visit, use, or navigate our services, we may process personal information depending on how you interact with **Comsys S.A.** and the services, your choices, and the products and features you use.

**Do we process any sensitive personal information?** We do not process sensitive personal information.

**Do you receive any information from third parties?** We may receive information from public databases, marketing partners, social media platforms, and other outside sources.

**How do you process my information?** We process your information to provide, improve, and administer our services, communicate with you, prevent security and fraud, and comply with the law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason.

**In what situations and with which types of parties do we share personal information?** We may share information in specific situations and with specific categories of third parties.

**How do we keep your information safe?** We have organizational and technical processes and procedures to protect your personal information. However, no

electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

**What are your rights?** Depending on where you are geographically located, the applicable privacy law may mean you have certain rights regarding your personal information.

**How do I exercise my rights?** The easiest way to exercise your rights is by contacting us. We will consider and act upon any request following applicable data protection laws.

Want to learn more about what Comsys S.A. does with any information we collect? Review the notice in full below.

## 3. WHAT INFORMATION DO WE COLLECT?

### 3.1 Personal Information you Disclose to us

**In Short:** We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and services, when you participate in activities on the services, or when you contact us.

**Personal Information Provided by You.** The personal information we collect depends on the context of your interactions with us and the services, your choices, and the products and features you use. The personal information we collect may include the following:

- Name, Surname
- Company
- Business Email
- Country
- Telephone

**Sensitive Information.** We do not process sensitive information.

**Social Media Login Data.** We may allow you to register with us using your existing social media account details, like your Facebook, Twitter, or other social media account.

All personal information you provide must be true, complete, and accurate, and you must notify us of any changes to such personal information.

### 3.2 Information Automatically Collected

**In Short:** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our services.

We automatically collect certain information when you visit, use, or navigate the services.

This information does not reveal your specific identity (like your name or contact information). Still, it may include device and usage information, such as your IP address, browser, and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our services, and other technical information. This information is

primarily needed to maintain the security and operation of our services and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. You can find out more about this in our Cookie Notice: [www.comsyscx.com/cookie-policy](http://www.comsyscx.com/cookie-policy).

The information we collect includes:

- **Log and Usage Data.** Log and usage data are service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our services and record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the services (such as the date/time stamps associated with your usage, pages, and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called “crash dumps”), and hardware settings).
- **Device Data.** We collect device data such as information about your computer, phone, tablet, or other devices you use to access the services. Depending on the device used, this device data may include your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

### 3.3 Information collected from other sources

**In Short:** We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.

To enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles for targeted advertising and event promotion.

Suppose you interact with us on a social media platform using your social media account (e.g., Facebook or Twitter). In that case, we receive personal information about you, such as your name, email address, and gender. Any personal information that we collect from your social media account depends on your social media account’s privacy settings.

## 4. HOW DO WE PROCESS YOUR INFORMATION?

**In Short:** We process your information to provide, improve, and administer our Services, communicate with you for security and fraud prevention, and to comply with the law. We may also process your information for other purposes with your consent.

**We process your personal information for a variety of reasons, depending on how you interact with our services, including:**

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in to your account and keep your account in working order.
- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfill and manage your orders.** We may process your information to execute and manage your orders, payments, returns, and exchanges through the services.
- **To enable user-to-user communications.** We may process your information if you choose to use any of our offerings to communicate with another user.
- **To request feedback.** We may process your information when necessary to request feedback and contact you about your use of our services.
- **To send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time. For more information, see "*WHAT ARE YOUR PRIVACY RIGHTS?*" below).
- **To deliver targeted advertising to you.** We may process your information to develop and display personalized content and advertising tailored to your interests, location, and more. For more information see our Cookie Notice: [Cookie Notice URL].
- **To protect our services.** We may process your information as part of our efforts to keep our services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process information about how you use our services to understand better how they are being used so we can improve them.
- **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest to prevent harm.



## 5. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

**In Short:** We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on to process your personal information. As such, we may rely on the following legal grounds to process your personal information:

- **Consent.** We may process your information if you have permitted us (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our services or at your request before entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests. Those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described to:
  - Develop and display personalized and relevant advertising content for our users
  - Analyze how our services are used so we can improve them to engage and retain users
  - Support our marketing activities
  - Diagnose problems and/or prevent fraudulent activities
  - Understand how our users use our products and services so we can improve user experience
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

In legal terms, we are generally the “data controller” under European data protection laws of the personal information described in this privacy notice, since we determine the means and/or purposes of the data processing we perform. This privacy notice does not apply to the personal information we process as a “data processor” on behalf of our customers. In those situations, the customer we provide services to and with whom we have entered into a data processing agreement is the “data controller” responsible for your personal information. We merely process your information on their behalf in accordance with your instructions. If you want to know more about our customers’ privacy practices, you should read their privacy policies and direct any questions you have to them.

## 6. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

**In Short:** We may share information in specific situations described in this section and/or with the following categories of third parties.

**Vendors, Consultants, and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors, or agents (“third parties”) who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The categories of third parties we may share personal information with are as follows:

- Ad Networks
- Affiliate Marketing Programs
- Cloud Computing Services
- Communication & Collaboration Tools
- Data Analytics Services
- Data Storage Service Providers
- Performance Monitoring Tools
- Product Engineering & Design Tools
- Sales & Marketing Tools
- Social Networks
- User Account Registration & Authentication Services
- Website Hosting Service Providers

## 7. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

**In Short:** We are not responsible for the safety of any information you share with third parties that we may link to or advertise on our services but are not affiliated with.

The services may link to third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not affiliated with us and may link to other websites, services, or applications. Accordingly, we do not guarantee any such third parties, and we will not be liable for any loss or damage caused by the use of such third-party websites, services, or applications. The inclusion of a link towards a third-party website, service, or application does not imply an endorsement by us. We cannot guarantee the safety and privacy of data you provide to third parties. This privacy notice does not cover any data collected by third parties. We are not responsible for any third parties' content or privacy and security practices and policies, including other websites, services, or applications that may be linked to or from the

Services. You should review the policies of such third parties and contact them directly to respond to your questions.

## **8. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

**In Short:** We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice: [www.comsyscx.com/cookie-policy/](http://www.comsyscx.com/cookie-policy/).

## **9. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?**

**In Short:** We may transfer, store, and process your information in countries other than your own.

Our servers are located in Germany and Greece. If you are accessing our services from outside Germany and Greece, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information .

## **10. HOW LONG DO WE KEEP YOUR INFORMATION?**

**In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as necessary for the purposes set out in this privacy notice unless a more extended retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us to keep your personal information for longer than 24 months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **11. HOW DO WE KEEP YOUR INFORMATION SAFE?**

**In Short:** We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process.

However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, the transmission of personal information to and from our services is at your own risk. You should only access the services within a secure environment.

## 12. DO WE COLLECT INFORMATION FROM MINORS?

**In Short:** We do not knowingly collect data from or market to children under 18.

We do not knowingly solicit data from or market to children under 18. By using the services, you represent that you are at least 18 or the parent or guardian of such a minor and consent to such minor dependent's use of the services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to delete such data from our records promptly. If you become aware of any data we may have collected from children under the age of 18, don't hesitate to contact us at [DPO@Comsyscx.com](mailto:DPO@Comsyscx.com).

## 13. WHAT ARE YOUR PRIVACY RIGHTS?

**In Short:** In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the EEA, UK, and Canada), you have certain rights under applicable data protection laws. These may include the right:

- (i) to request access and obtain a copy of your personal information,
- (ii) to request rectification or erasure,
- (iii) to restrict the processing of your personal information; and
- (iv) if applicable, to data portability.

In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us using the contact details provided in the "HOW CAN YOU CONTACT US ABOUT THIS NOTICE section?" below.

We will consider and act upon any request per applicable data protection laws.

Suppose you are located in the EEA or UK, and you believe we are unlawfully processing your personal information. In that case, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

[https://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

If you are located in Switzerland, the contact details for the data protection authorities are available here:

<https://www.edoeb.admin.ch/edoeb/en/home.html>.

**Withdrawing your consent:** If we rely on your consent to process your personal information, which may be express and/or implied, depending on the applicable law, you have the right to withdraw your consent. You can withdraw your consent at any time by contacting us by using the contact details provided in the section “*HOW CAN YOU CONTACT US ABOUT THIS NOTICE?*” below or by updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal. When applicable law allows, will it affect the processing of your personal information based on lawful processing grounds other than consent.

**Opting out of marketing and promotional communications:** You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided in the section “*HOW CAN YOU CONTACT US ABOUT THIS NOTICE?*” below. You will then be removed from the marketing lists. However, we may still communicate with you, for example, to send you service-related messages necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

## 13.1 Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

Contact us by email using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. To opt out of interest-based advertising by advertisers on our Services, visit <http://www.aboutads.info/choices/>.

For further information, please see our Cookie Notice: [www.comsyscx.com/cookie-policy](http://www.comsyscx.com/cookie-policy).

If you have questions or comments about your privacy rights, you may email us at [DPO@comsyscx.com](mailto:DPO@comsyscx.com).

## 14. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers, mobile operating systems, and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference and not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. We do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 15. DO WE MAKE UPDATES TO THIS NOTICE?

**In Short:** Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated “Revised” date, and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to inform you how we protect your information.

## **16. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO) by email at [DPO@comsyscx.com](mailto:DPO@comsyscx.com), by phone at +30 210 9241486, or by post to:

Comsys SA  
Data Protection Officer (DPO)  
225 – 227 Kifissias Avenue  
145 61  
Greece

## **17. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please send an email to [DPO@comsyscx.com](mailto:DPO@comsyscx.com).