

9.1. Personal Data Protection Policy (Privacy Policy) of the Company Website

Preamble

The term “this website” refers to “www.hellagro.gr”, which is owned by the company bearing the name “HELLAGRO PUBLIC LIMITED COMPANY FOR THE TRADING AND PACKAGING OF AGRICULTURAL PRODUCTS AND ASSOCIATED GOODS”, which is the exclusive administrator of this company and will be hereby referred to as “we” or “the company”. The term “our services” refers to the services we provide online, as well as other services we may provide at times.

In this policy you will be referred to as “the user(s)”, “the visitor(s)”, “you”.

In the context of your visit to and navigation of the website www.hellagro.gr and in order to use the services we provide, it is likely that we request that you enter certain personal information and private data.

We are fully committed to the protection and respect of your privacy and personal information, and we only use data collected from you lawfully in the context of our activities. Your use of our website is governed by this Policy and its Terms of Use. This Policy clarifies what type of information and private data we collect, the purposes for which we collect them, the manner in which we use and/or share them, and how they are stored. It should be noted that this Policy applies exclusively to data collected or obtained through this website and not data collected or obtained in other ways or by other means. Please read this Policy carefully in order to understand our company practices regarding your private data and how we use them.

This Policy complies fully with the General Data Protection Regulation (GDPR – EU 2016/679) and the amended Regulations on the protection of privacy in electronic communications.

We unequivocally respect your rights to privacy and private data, and we acknowledge the importance of protecting the information we collect from you. This Privacy Policy concerns the private data we collect and the manners in which we collect, store, share, and use said data.

In this Policy we explain:

- (1) What type of private data we collect from you and for what purpose.
- (2) What cookies are.
- (3) How your data might be used.
- (4) With whom we might share your private data.

- (5) Where the processing and storage of your private data takes place.
- (6) The amount of time for which we may keep your private data.
- (7) Provisions for opt-in and opt-out purchasing options.
- (8) How you can access your private data and update them.
- (9) How we protect your private data.
- (10) Why our website contains links to other websites and social media.
- (11) How we may modify this Policy.
- (12) Where and how you can submit questions, complaints, or contact us regarding this Policy.

In order to use the services provided through this website, you must explicitly confirm that you have attained the age of 15. If you have not attained the age of 15, you must either abstain from using our website or inform us of your legal guardian as regards to this Policy so that we can get their consent on this Policy before you enter your private data on our website, subscribe to our services, or place an order. The legal guardians of minors are solely responsible for preventing the individuals under their care from accessing and using websites directed to adults. In no case and under no condition should our website be used by minors under the age of 14.

- (1) What type of private data we collect from you and for what purpose.

We may collect certain private data from you when you enter them in order to use one of our services, to place an order, to use our online services, to contact us in any other way – for example, on social media –, to comment on our blog, to participate in contests and other promotional actions, to express your interest in special offers, to receive notifications, to participate in market research, or to fill in questionnaires. You must give your clear and explicit consent on every occasion by selecting (checking) the corresponding box, so that we be able to process your private data for any of the aforementioned actions.

With this Policy we declare that our website is guided by the data minimization principle, which is why we collect the minimal amount of data necessary for use to be able to provide our services to you.

The data we collect from and keep on you may include your full name, your e-mail address, your phone number (mobile and/or landline), your home address, your shipping address, your billing address, your IP address, your search criteria, your search history, your replies to market research, the type of browser you use (e.g. Internet Explorer, Google Chrome, Mozilla Firefox, Safari), the time in which you visit our website and the time you spend on it, the URL from which you were redirected to our website, the Cell ID providing your mobile phone service when you access our

website or other geolocation data, and/or the content you share with us when you use our services. We take every reasonable measure to the best of our abilities so that we keep your order information or any of your communications with us absolutely secure, however, in case of failure to assist or even mild negligence on our behalf, we may not be deemed responsible for any loss you may suffer in case a third party gains unauthorized access to data you provide when navigating or ordering from our website.

Furthermore, our website does not collect data for the purpose of linking them to certain individuals, yet some data could, due to their nature, allow or facilitate user identification by being processed and associated with data kept by third parties. This type of data includes IP addresses, domain names retrieved by the website user's computer, the URIs (Uniform Resource Identifiers) of sources searched, the times in which searches have taken place, the method used in order to submit a search request to the server, the size of the file recovered in response to the request, the numerical code indicating the status of the response given by the server (successful, error, etc.), and other parameters regarding the user's operating system and operating environment.

These data are used in order to obtain anonymized statistical information on the use of our website and to verify its proper operation, and they are immediately deleted once they have been processed for this purpose. These data may also be used in case of criminal acts against the website. Besides these cases, however, said data is not kept for more than 30 days.

We may also collect data on the way you use our services, such as the time in which you begin to navigate our website and its services and the duration for which you do so, the identity of the website from which you were redirected to our website or the identity of the website to which you are redirected after you have visited ours, the options you choose and the preferences you set when using our services (even if you do not go through with an order), and the information you provide to our website when rating a product or service we offer.

We may collect data regarding your computer or other electronic device you use to connect to our services, such as the type of device (including its unique identification numbers), the operating system you use, the browser or applications you have installed in your device, your internet service or phone network provider, your IP address, or your phone number.

We do not collect data on your actual and exact location, only on your estimated location in terms of city, which may be determined from the IP address you use. In certain cases, and only with your explicit consent, we may use cookies or other similar technologies in order to store and access data collected through the services we provide. For instance, we may collect data on the IP address you use to help us

diagnose errors in our server.

(2) What cookies are.

We use technologies such as cookies so as to provide, improve, protect, and promote our services. This is how we collect data on your use of our online services. Cookies are very small files sent by our websites to your computer or other devices you use which allow us to access them when you visit our website. Cookies help us recognize you and recover other information regarding your visits to our website. They also help our website show you information that pertains to your interests.

Session cookies (which are not permanently stored in the user's computer and are gone when the current operation of the browser is terminated) are strictly used to transmit files that identify the characteristics of each specific session, and they are necessary for a safe and effective navigation of the website. For example, cookies help us with operations such as memorizing the username for future use, understanding the way in which you use our services, and improving said services based on the information we receive, but they do not allow us to retrieve private data. You can configure the browser you use so that it does not accept cookies, although this may limit your ability to use our services. The only exception are the cookies that serve the operating needs of our website (functional cookies), which are necessary for the display and effective operation of the website on your computer.

(3) How your data might be used.

Every time you provide private data to us, we use them in accordance with the existing provisions and for the purposes mentioned in this Policy, in the data forms you fill in, in other relevant terms and conditions, or in e-mails we send you after you have entered data on our website.

Use of our services: If you use one of our services and/or enter, check, or modify your account information, we record certain private data. These data are primarily used in order for us to provide our services or give you information for which you may be searching. We keep the information which you provide to us and may use it for various purposes, including, among others, (a) to receive orders, (b) for accounting purposes or billing, (c) to check your identity, (d) for administrative and legal purposes, (e) to match or reject data for statistical and market analysis purposes, or in order to inform you on the market, with your explicit consent, (f) for the development, control, and maintenance of our system, (g) to conduct customer satisfaction surveys, with your explicit consent, (h) to provide customer service and be assisted on future transactions with you – for instance, in order to better recognize your needs and preferences, with your explicit consent –, (i) where it is required by law or it is necessary for the fulfillment

of legal procedures or the settlement of disputes, and (j) for any other purpose mentioned in the terms and conditions we have set in order for our services to be used. Solely for the aforementioned purposes, we may disclose such information to one or more of the entities mentioned in the section “With whom we might share your private data” (4) of this Policy.

Customization of our online services and targeted advertising: We may use information which you provide to us or which we collect through cookies when you use our services so as to have some insight into your interests. We may then use this insight in order to ensure that you do not miss any offers or information that might interest you when you visit our website or use our online services. Such information may also be used by third parties affiliated with us for the promotion of products and services when you visit the websites and use online services of third parties (targeted advertising).

Comments and reviews submitted regarding our online services: If you wish to submit a comment regarding our services on our blog, we reserve the right (but are not obligated) to publish said comment online or elsewhere in order to promote our business and services. In such cases, we collect data such as your name – which will appear next to your comment – and your e-mail address – which will not be published but may be used so as to contact you regarding your comment.

Mobile services: When you request that we provide you services via mobile phone, we may keep records of your mobile phone number, the type of mobile phone device you use, the operating system of the device, and data on your mobile services provider, and we may connect a unique identification number with your mobile phone device. We may store the language used in your mobile phone device, the language used in the applications, and the country of origin. We require such data in order to provide our services via mobile phone services and to manage them.

Customer surveys: Occasionally we may ask for your opinion on our services and on products you have purchased through them. When conducting surveys, we may use cookies and combine the data we have collected through said cookies with your answers.

We mainly use your private data in order to reach solid scientific conclusions, to develop new services, and, with your explicit consent, to send you newsletters and other information on events and/or other services in which we believe that you may be interested, as well as for statistical and research-related purposes.

Specifically, we use the data we collect for the following purposes:

(a) To manage your account and provide our services, to update your personal information, and to maintain the accuracy of said information; we use data collected directly from you for such purposes. (b) To ensure that the content of the services we

provide is presented to you in the most efficient way for you and your devices, and to display content and features that suit you, your interests, and the manner in which you use the provided services; we use data collected directly from you, data on how you use our services, and data on how you can connect with the services provided to you for such purposes. (c) To provide information on services you have requested from us or for services in which we believe that you may be interested (according to your commercial preferences); we use data collected directly from you for such purposes, and always with your explicit consent, which is state by selecting (checking) the corresponding box on our website (opt-in policy). (d) To determine and anticipate information that may interest you or be relevant to you; we use data collected directly from you, data on how you use our services, and data on how you can connect with the services provided to you for such purposes. (e) To reach solid scientific conclusions, to conduct polls, and for statistical and research-related purposes. (f) To notify you regarding any changes to the services we provide and to reply to your complaints and any issue that arises regarding the services provided; we use data collected directly from you for such purposes. (g) To prevent, detect, and investigate illegal activities, breaches of agreements between the company and you, and threats to the security of the services provided; we use data collected directly from you, data on how you use our services, and data on how you can connect with the services provided to you for such purposes. (h) To produce aggregated statistical and analytical data on you and on how you receive our services.

(4) With whom we might share your private data.

We may share data in accordance with the aforementioned, but we will never sell said data to advertisers or other third parties. In order for us to be able to share data, you need to provide your explicit consent by selecting (checking) the corresponding box on our website.

We can share private data you have provided freely and as we see fit exclusively in the following cases:

With legal or natural persons working for and with www.hellagro.gr. We are affiliated with trusted third parties (software support services, accountants, lawyers) so as to provide, improve, and promote our services; these third parties comply with this Policy and are liable to manage your data in accordance with our guidelines.

Law and public order: We may disclose your private data to third parties if we deem that such disclosure (a) is required by Law, by judicial decision, or is demanded by any competent governmental, judicial, police, administrative, or regulatory authority in accordance with existing legislation, (b) is necessary for the protection of a person against a risk to their or serious hazard to their health, (c) is necessary for the prevention of fraud or financial exploitation of our website users, or (d) is required for

the legal protection of our intellectual property rights.

(5) Where the processing and storage of your private data takes place.

When we use your private data in accordance with what is stipulated in this Policy, we may transfer, process, or store said data to a location outside the European Economic Area (EEA). When we do this, we take all necessary precautions in order to protect the integrity of your data and ensure your rights on said data. By providing your data to us and selecting (checking) the corresponding box available on our website, you state that you agree to the transfer, storage, and processing of your data outside the EEA.

Some states outside the EEA may have inadequate provisions on the protection of private data, or may provide different levels of protection for said data. By providing your data to us and as long as we use them in the manner previously mentioned in this Policy, you agree that we bear no responsibility on how your data is used by third parties located at such states that receive and process them.

All the data you provide to us are stored in our computers and/or the secure servers of third parties which provide us with hosting services under our responsibility.

(6) The amount of time for which we may keep your private data.

We will keep your private data until they are deleted, and for a maximum of five (5) years. The amount of time for which your data is kept will always comply with the national law. If you decide to delete your account or if you send us an e-mail on the matter at info@hellagro.gr, we will delete or destroy any and all private data you have provided to us, without prejudice (a) to the amount of time required to delete said data from our servers and back-up files, and (b) to our obligation to maintain certain data in accordance with national or European law or if its necessary that we maintain such data to settle disputes, to enforce the fulfillment of agreements, or to enforce the implementation of decisions. In any case, we apply the data minimization principle, therefore we will maintain only the data necessary to fulfill such purposes.

(7) Provisions for opt-in and opt-out purchasing options.

We offer you the option to receive news and updates on our products and services, which we promulgate via phone, live chat, e-mail, SMS, or direct mail based on your preferences. Such communications include notifications on new products, offers, contests, events, and promotional actions. Our website has a strict opt-in policy as regards to this type of communications, which means that the aforementioned will be received by you only if you actively choose to do so by selecting (checking) the corresponding box available on our website.

You have the right to change your mind at any moment and request that we not use your private data for marketing purposes. We will offer you the option to deregister from any of our services and refuse any promotional communication which you had previously accepted at any moment. Every time you receive direct marketing material, you will be notified of the manner in which you can unsubscribe from our particular list. Alternatively, you can modify your choices by opting out, that is, by actively choosing to not receive such communications by selecting (checking) the corresponding box available on our website.

(8) How you can access your private data and update them.

You have the right to review the private data we keep on you and to update them at any moment. If you wish to receive a copy of the private data we keep on you, please contact at the e-mail address: info@hellagro.gr.

If for any reason you deem that the private data we keep on you is incorrect, please visit our website and contact us so as to be given the opportunity to review and modify your private data. Only you and, upon your request, the Customer Service Team of our website can access your private data through an e-mail notice. If you so wish, you can contact us at the e-mail address: info@hellagro.gr and request that we modify or delete your private data.

(9) How we protect your private data.

The appropriate security measures are taken on our website in order to ensure the safety, integrity, and privacy of the information you have provided to us. We apply adequate technological measures and security policies, which have been designed to safeguard the private data that we keep. We also comply with the data security procedures in accordance with the existing legislation regarding the storage, processing, use, and disclosure of the data you have provided to us, as well as the measures we have drawn up and put in place in order to prevent any unauthorized access to or use of the data we keep.

Our primary concern is that you feel safe in the knowledge that your data is secure, which is why we perform frequent checks regarding their security while we keep improving the security technologies we apply in order to ensure the safety and integrity of your data.

(10) Why our website contains links to other websites and social media.

Our services contain hyperlinks which link to websites that operate under the supervision of other administrative entities. Those websites have their own Data Protection/Privacy Policies and Cookies Policies, which we strongly advise that you

read carefully. These entities monitor how your private data is used when you provide them to them or when they access them by using cookies. In no case is our company responsible for how your data are used by other websites to which you may be redirected by websites whose hyperlinks are hosted on our website.

If you follow us or interact with us in any way on our social media pages and accounts, such as on Facebook, Twitter, and LinkedIn, the data you provide there are subject to both our Data Protection Policy (Privacy Policy) of the Company Website and to the corresponding Policies of the social media in question.

(11) How we may modify this Policy.

In case the corporate or organizational structure of our company undergoes any changes or in case our company is taken over by or merged with another company, then your private data may be transferred to the new business entity. In such a case, we will notify you by any means available (e.g. via e-mail at the e-mail address you have entered in your account) of this change and present you with your options. You may be asked to renew your consent regarding our processing of your private data.

Moreover, we may occasionally revise this Policy and publish its most recent version. Any amendment to this Policy will be in effect from the moment it is posted on our website. We strongly advise that you review our website Policy regularly so as to be informed of any amendments that may have taken place.

If the level of protection of your private data is lowered or essentially different after an amendment to this Policy, you may be asked to renew your consent regarding our processing of your private data.

(12) Where and how you can submit questions, complaints, or contact us regarding this Policy.

If you have any questions or complaints regarding the procedures used by our company to process your private data, please contact us at the e-mail address: info@hellagro.gr. For any complaints you may have, you have the right to submit a query or file a complaint to the Data Protection Authority (DPA).

Last modified on: 7 October 2019