

## **GDPR POLICY**

The management of your personal data is a priority for the company ELLINIKOS TOURISMOS SA. You have trusted us using our services and we appreciate it. Our company is committed to protecting your privacy with regard to the security of your personal data, and takes this obligation seriously.

This Privacy Policy is intended to help you understand what information is collected by ELLINIKOS TOURISMOS SA, its partner companies and the brand family it manages, why they collect it and how they treat it. Determines how ELLINIKOS TOURISMOS SA, the company based in Greece, Thessaloniki (Egnatia, 54), controls and treats your information on websites, brands, products, applications, advertising services, services or technologies ( we will collectively refer to them as the "Services").

We want to explain to you in a simple and clear way what information we collect and how we collect, use and protect it. All personal data is collected and processed in accordance with the laws on personal data protection of Greece and the European Union, and under the new General Data Protection Regulation (GDPR).

In addition, at the end of this document you will find information on how to contact us in case you have questions about your personal data, to which we will be happy to answer.

This Privacy Policy does not apply to the practices of companies that ELLINIKOS TOURISMOS SA does not own and control.

### **let's start from the basics**

We have taken all technical and organizational measures to ensure that data protection rules are followed by both us and our external service providers.

Your consent to this Privacy Policy is required. Unfortunately, if you do not agree with this you should stop using our services. If you continue to use our products and services from and after May 25, 2018, you declare that you agree and accept the present and our use of your data.

There are many different ways in which you can use our services. If you use ELLINIKOS TOURISMOS SA, then you know that it offers travel related services through its website. In order to activate the services of ELLINIKOS TOURISMOS SA, we may share your information, including your personal data, with our family of companies related to joint ownership or control.

### **Collection of personal data**

Because when you use our services, for the processing of your reservation we need certain data, we request you and collect the following personal data. This information is necessary for the proper performance of the contract between us and for us to be able to comply with our legal obligations. Without this, we may not be able to provide you with all the services you requested.

#### **1. PERSONAL DATA WE COLLECT**

There are two general categories of information we collect.

##### **1.1 Information you give us**

This information is necessary for the adequate execution of the contract between us, so that we can comply with the legal obligations and taking into account our legal interest to provide and improve the operations of the ELLINIKOS TOURISMOS SA platform.

Some of your personal information we collect may include (where applicable)

- your name and the names of any of your fellow travelers,
- addresses, contact details, telephone numbers, email addresses,
- EU passport or political identity number,
- In some cases, we may also collect information with any preferences related to your stay.

## **1.2 Information we collect from third parties**

It's not just what you share with us, we can get information about you from other sources as well. These include our business partners, such as affiliate partners and other independent third parties, and anything we receive from these sources may be combined with the information you have provided to us. We use third party services to facilitate travel payments. Our partners may share information about you with us when you have questions about a service or pending service or when disputes arise.

In addition, you may participate in contests, referral programs or lotteries which means that you will need to provide us with your personal information. Of course, you can also tell us your opinion or ask for help when using the services of ELLINIKOS TOURISMOS SA.

In case you book a trip on behalf of someone else we must emphasize that it is your responsibility to ensure that the person or persons whose details you have provided know and have accepted the way in which Greek Tourism uses their details ( as described in this Privacy Policy).

## **2. HOW WE USE THE INFORMATION WE COLLECT**

We use, store and process information, including personal data, regarding the provision, improvement and development of the ELLINIKOS TOURISMOS SA platform, the creation and maintenance of a confidential and secure environment and compliance with our legal obligations.

### **2.1 Provision, Improvement and Development of the ELLINIKOS TOURISMOS SA platform**

Your data may be used for the following purposes:

- For the provision of products and services you request, which is the purpose of our company! We may also offer other travel related products and services. In this case we will use your details to complete your order.
- Providing customer service. To serve our customers, to answer any questions you may have about your booking (or other relevant questions) as well as to contact you via email, mail, phone, through our website or applications, as well as via sms - the way we choose depends on the contact information you have given us.
- We also use personal data for the purpose of improving our services. This analysis is part of our quest to improve our services and your experience.

### **2.2 Provide, personalize and improve advertising and marketing**

- We also use your data for marketing actions. From time to time we can send you updates on our products and services (newsletter). You can opt out of receiving marketing messages from us by following the unsubscribe instructions included in your marketing communications.
- Also, when you participate in other promotions (such as tenders or lotteries) or market research, the relevant information is used to make these offers. In case you give us additional personal information for these purposes, they will be used only with your consent.

## **2.3 Creating and maintaining a reliable and secure environment**

- Conduct safety investigations and risk assessments.
- For security purposes such as user authentication and bookings.
- For the purpose of preventing / detecting crime, for detecting and preventing fraud and other illegal or unwanted actions.
- Legal purposes: finally, in some cases we may need to use your information for the management and resolution of legal disputes, for regulatory research and compliance or for the implementation of the terms of use of the ELLINIKOS TOURISMOS SA services to a reasonable extent.

We process this information, taking into account our legitimate interest in improving the services and services of ELLINIKOS TOURISMOS SA and your experience and where necessary for the satisfactory execution of the contract with you.

## **3. LEGAL BASIS FOR THE PROCESSING OF YOUR DATA**

- Execution of a contract: the use of your data may be necessary for the execution of your contract with us, for the needs of a smooth and easy transaction between the parties. For example, if you use our services to make a reservation, we will use your information to fulfill our obligation to complete and grant you the reservation in accordance with our contract with you.
- Consent: we may rely on your consent to use your personal information for certain direct marketing purposes. You can withdraw your consent at any time by contacting us at the addresses at the end of this Privacy Policy.
- Legal interests: we may use your information for our legitimate interests, such as providing you with the most appropriate website content, email and newsletter, to improve and promote our products and services and our website content, but also for management, fraud detection and legal purposes.

## **4. DISCLOSURE OF INFORMATION ABOUT YOU**

We follow strict security procedures for the storage and disclosure of our customers' data. There are various places that are connected to the services of ELLINIKOS TOURISMOS SA in different ways and for different reasons, take the same measures to protect your personal data with our company and process your data only within the framework of our explicit and written order. The main purpose of disclosing some of your personal information is the completion of our services and your reservation as the recipients who will be specifically identified and are the employees and new recruits in the company in the context of the processing of the contract. Ensure that only authorized officials have access to transaction information and only when necessary, e.g. for processing bookings.

- Such places can be the airline with which your flight will be realized, the accommodation in which you made a reservation, a car rental office, in case you requested such a benefit. In these places we transfer your relevant booking details such as your name, your contact details, the names of your fellow travelers and any preferences you mentioned when booking.
- Your personal data (email address) is transmitted to the company MailChimp, which provides our company with marketing automation tools (newsletters) and acts on our behalf.
- We may also provide your information to government authorities or regulators to comply with the law.

- There are other places that may receive some of your data, places that we need to provide Greek Tourism services, such as financial institutions. In case of disputes regarding a reservation and in case a refund is requested for your reservation either by you or by the holder of the credit card used to make your reservation, we can give the payment service provider and the respective financial institution some details of your reservation in order to manage the possible refund if necessary. These may include a copy of your booking confirmation as proof of booking. In addition, we may share information with the relevant financial institutions if we deem it absolutely necessary for fraud prevention and detection purposes.

Moreover, ELLINIKOS TOURISMOS SA undertakes not to disclose your details and those of your transactions, unless it has a written authorization from you, or this is imposed by a court decision or a decision of another public authority. All documents and electronic data that will be exchanged between the parties under the contract will be kept by ELLINIKOS TOURISMOS SA.

## **5. MANAGEMENT OF DATA CHILDREN**

We understand the importance of the necessary extra precautions for the protection and privacy of children. Consequently, our company services are only allowed to be used by adults over 18 years of age. We process the data of minors against 18 years of age only with the consent of their parents or legal guardians.

If we receive information from a minor under the age of 18, we reserve the right to delete it. In limited cases, in the context of a booking, purchase of another travel-related service or exceptionally in other cases (such as in the case of services aimed at families) ELLINIKOS TOURISMOS SA may collect and use child data, only with the consent of a parent or legal guardian.

## **6. MEDIA OF SOCIAL NETWORKING**

We use social media in a variety of ways: to promote the travel-related products and services we offer, and to advertise, improve and facilitate our services.

You can also contact ELLINIKOS TOURISMOS SA via social media to ask about our services. In these cases the information you choose to share with us may include key information from your social media profile.

Consult the privacy statement of these third party social media providers to learn more about these practices.

## **8. YOUR RIGHTS**

Responsible for processing personal data

ELLINIKOS TOURISMOS SA, which is based in Thessaloniki, is the one that controls the processing of personal data on its website.

You can exercise any of the rights described in this section by sending an email to [dpo@ambotis.com](mailto:dpo@ambotis.com). We may ask you to verify your identity before taking further action on your request.

### **8.1 Correction of inaccurate or incomplete information**

You have the right to ask us to correct inaccurate or incomplete personal information about you.

## **8.2 Data retention and data deletion**

We generally retain your personal information for as long as is necessary for the performance of the contract between us and to comply with our legal obligations.

If you no longer wish us to use your information to offer you our services, you may request that we delete your personal information. Please note that if you request the deletion of your personal information:

- We may retain some of your personal information as necessary to our legitimate business interests, such as detecting and preventing fraud and enhancing security.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, we may retain some of your information on tax, reporting and control obligations.

## **8.3 Withdrawal of Consent and Restriction of Processing**

Where you have provided your unequivocal consent for the processing of your personal data by ELLINIKOS TOURISMOS SA, you can withdraw your consent at any time, sending an announcement to ELLINIKOS TOURISMOS SA, specifying which consent you withdraw. Please note that the withdrawal of your consent does not affect the legality of any processing activities under this consent prior to its withdrawal.

## **9. SECURITY**

In accordance with European and Greek data protection laws, we apply reasonable procedures to prevent unauthorized access, loss, destruction or alteration and misuse of your personal data.

ELLINIKOS TOURISMOS SA recognizes the importance of the issue of the security of your personal data and has taken all the necessary measures, with the most modern and advanced methods, to ensure the maximum possible security:

- All information related to your personal information is kept confidential.
- Ensure that only authorized employees have access to transaction information and only when necessary, e.g. for processing bookings.

## **10. CHANGES IN THE CURRENT POLICY POLICY**

ELLINIKOS TOURISMOS SA reserves the right to modify this Privacy Policy at any time, in accordance with this provision. If we make changes to this Privacy Policy, we will publish the revised Privacy Policy on the ELLINIKOS TOURISMOS SA platform and update the "Last Updated" date at the top of this Privacy Policy. If you disagree with the revised Privacy Policy, you should stop using the ELLINIKOS TOURISMOS SA platform. If you continue to use the ELLINIKOS TOURISMOS SA platform, your access will be subject to the revised Privacy Policy.

## **11. CONTACT US**

If you have any questions or complaints about this Privacy Policy or the information management practices of ELLINIKOS TOURISMOS SA, you can send us an email at [dpo@ambotis.com](mailto:dpo@ambotis.com) or contact us at: Thessaloniki, Egnatia 54.

## **PARTNERS & THIRD PARTIES**

The ELLINIKOS TOURISMOS SA platform may contain links to websites or third party services, such as co-branded services or third-party branded services. ELLINIKOS TOURISMOS SA does not own or control these Third Party Affiliates and when you interact with them, you may provide information directly to ELLINIKOS TOURISMOS SA Partner Partner or both. These third parties will have their own rules regarding the collection, use and disclosure of information. We encourage you to check the privacy policies of the other sites you visit