

PRIVACY POLICY

SUMMARY

- 1. DATA CONTROLLER:** We are the company "I. TERPOUIKIDIS & SONS S.A." and d.t. LONDESSA SA and we process your personal data as a *controller*.
- 2. PURPOSE OF USING YOUR DATA:** We will use your data (collected online or in person) to **manage your registration** as a user, to manage your purchases of **products or services**, to answer your questions **and, if you wish, to send you** personalized communications.
- 3. LEGAL BASIS FOR USING YOUR DATA:**

We are entitled to process your data for various reasons. The main reason is that we need to process them for the **performance of the contract** you enter into with us when registering and making a **purchase** or when you receive any of our services or features, however there are other reasons that allow us to use them; including, but not limited to, our interest in answering your questions or the **consent** you give us to send you our newsletter.
- 4. WITH WHOM WE SHARE YOUR DATA:** We share your data with service providers who help or support us, who may be third-party partners with whom we have a contract and who are located within the European Union.
- 5. YOUR RIGHTS:** You have the right to access, rectify or delete your personal data.

In some cases, you also have other rights, for example, to object to our use of your data or the right to data portability, as explained in detail below.

We invite you to read the full Privacy Policy below to fully understand how we use your personal data and the rights you have over it.

1. WHO IS THE CONTROLLER OF YOUR DATA?

The controller of your data is the société anonyme under the name "I. TERPOUIKIDIS & Sons S.A.» and p.t. **LONDESSA SA**, based in Kavala at 3 Nileos Street, (VAT number 094226210), as legally represented.

2. PURPOSE OF USING YOUR DATA:

Depending on the purpose for which we process your data from time to time, as explained above, we need to process one or more of your data, which will generally be, as the case may be, the following:

- **your identity** details (for example, your first name, last name, language and country from which you interact with us, contact details, etc.)
- **financial and transaction information** (for example, data payment or your card, information about your purchases, orders, returns, etc.)
- connection, geolocation and Internet browsing **data** (if, for example, you communicate with us from your mobile phone;)
- **commercial** information (for example, if you have subscribed to our newsletter);
- information about **your preferences**.

Please remember that when we ask you to fill in your personal data to access any of our features or services, we will mark certain fields as mandatory, since this is data that we need to be able to provide the service or give you access to that feature. Please note that if you decide not to provide us with this information, you may not be able to complete your registration as a user or may not be able to use these services or features.

Depending on how you interact with our company, e.g. depending on the services, products or functions you wish to receive, we will process your personal data for the following purposes:

PURPOSE	Personal data information
<p>1. To manage your registration as user of our online service / website</p>	<p>If you decide to register as a user on our website, we need to process your data to identify you as a user of the website and to give you access to the various functions, products, products and services available to you due to your status as a registered user. You can cancel your registered user account by contacting us through Customer Service.</p> <p>You can also make use of access or login through social networks such as Facebook, either register as a new user or link the login to your current account. In this case, your login credentials as well as the email in case you approve it, will be entered from your social media account. By using this login option, the social network may send us some additional information regarding your public profile, for example, your name, gender, approximate age or profile picture, in accordance with the social network's terms of use, which we advise you to read carefully. We will not retain this additional information unless you give us your consent. In addition, using this feature may mean that you share certain information about your activity with the social network. In any case, we recommend that you check your privacy settings and the privacy policies of social networks to know how these social networks process your data.</p>

2. For the development, fulfillment and execution of the sales contract or contract of services which you have concluded with us on the website.

This purpose includes the processing of your data, mainly for:

- **To contact you** about updates or informational notices **related to the functions, products or services for which the contract has been concluded**, including sending quality **surveys** and in order to be able to determine the degree of customer satisfaction regarding the service provided.
- **Manage** the payment of the products you purchase, regardless of the payment process used.

<p>3. To respond to requests and the applications you submit through Customer service channels</p>	<p>We only process the personal data that is strictly necessary in order to manage or resolve your request or application.</p>
<p>4. For marketing purposes</p>	<p>This purpose includes the processing of your data, mainly:</p> <ul style="list-style-type: none"> ▪ If and when you subscribe to our Newsletter, we will process your personal data to manage your registration, including sending personalized information about our products or services through various means (such as email or SMS). We may also provide this information to you through push notifications if you have enabled it on your mobile device. ▪ Accordingly, please note that this data processing involves analysing your profile as a user or customer to determine which are your preferences and, therefore, which products and services best suit your style when sending the information to you. For example, based on your purchases and browsing history (i.e. depending on the products you clicked); We will make suggestions for products that we think may be of interest to you and, if you are a registered user, provide you with the "Retrieve Cart" feature. ▪ Please remember that you can unsubscribe from the newsletter at any time and at no cost through the "Newsletter" section of the website, as well as through the instructions provided in each update. If you do not wish to receive push notifications, you can disable this option on your mobile device.

	<ul style="list-style-type: none"> ▪ To carry out promotions (for example, to organise competitions or to send a list of products you have saved to the email address you indicate). By participating in any promotion, you authorize us to process the personal data you have shared with us depending on the promotion and we may share it through various means such as social networks or our website. In each promotion in which you participate, you will be provided with terms and conditions where we will provide you with more detailed information about the processing of your data. ▪ Circulate photos or images that you have shared publicly on our Website or through our social media channels, provided that you have given us your explicit consent for this purpose.
<p>5. Usability and quality analysis to improve our services</p>	<p>If you enter our Website, we inform you that we will process your browsing data for analytical and statistical purposes, i.e. to understand how users interact with our Website and thus be able to introduce improvements to it.</p> <p>In addition, we sometimes conduct quality surveys and actions in order to know the degree of satisfaction of our customers and users and to identify those areas where we can improve ourself.</p>

3. LAWFUL BASIS FOR USING YOUR DATA:

The lawful bases that allow us to process your personal data also depend on the purpose for which we process it, as explained in the table below:

Purpose	Legalisation
<p>1. Managing your registration as a user of our Website</p>	<p>We process your data because it is necessary for the execution of the terms governing the use of the website. In other words,</p>

	<p>In order for you to register as a user on the website, we need to process your personal data, as otherwise we would not be able to manage your registration.</p> <p>In case you choose to use the access or connection through a social network, we are entitled to process your data based on the consent you give at the time of approving the transfer of your data from the social network.</p>
<p>2. Development, fulfillment and execution of the sales contract or contract of services</p>	<p>We process your data because it is necessary for the performance of the sales contract or contract of services with you.</p> <p>Some data processing related to the purchase process is activated only because you request or approve it, such as the payment through our third-party contracted partners, such as Banks or Credit Institutions or Payment Services in general.</p> <p>We believe that we have a legitimate interest in carrying out the necessary checks to detect and prevent potential fraud when you make a purchase. We understand that the processing of this data has a positive effect on all parties involved when paying for a purchase and especially for you, as this allows us to take steps to protect you from fraud attempts made by third parties.</p>

3. Customer Service

We have a **legitimate interest** in responding to requests or queries raised by you through the various existing communication channels. We understand that the processing of this data is also beneficial to you, insofar as it allows us to adequately assist you and answer the questions you raise.

When you contact us, especially to manage events related to your order or to the product / service obtained through the website, the processing of your data is necessary for the **execution of the sales contract**.

When your query relates to the exercise of your rights for which we inform you below or to claims regarding our products or services, we are entitled to process your data for our **compliance with our legal obligations**.

<p>4. Marketing</p>	<p>We are entitled to process your data for marketing purposes because of the consent you give us e.g. when you agree to receive personalized information through various means, when you authorize us to send push notifications to your mobile device, or when you accept the legal terms and conditions in order to participate in a promotion or to publish your photos on our Website or social media our networking.</p> <p>In order to show you personalised information, we consider that we have a legitimate interest in profiling the information we have about you (such as your browsing, preferences or purchase history) and the personal data you have given us, such as age range or language, as we understand that processing this data is also beneficial to you because it allows you to improve your user experience and access information in accordance with your preferences.</p>
<p>5. Usability and quality analysis</p>	<p>We consider that we have a legitimate interest in analyzing the usability of our Website and the degree of user satisfaction, as we understand that the processing of this data is also beneficial to you because its purpose is to improve the user experience and offer higher quality service.</p>

4. HOW LONG WILL WE KEEP YOUR DATA?

The **retention time** of your data will depend on the purposes for which we process it, as explained below:

Purpose	Retention period
1. To manage your registration as a user of our Website	We will process your data for the time period you remain a registered user (i.e. until you decide to unsubscribe).
2. Development, fulfillment and execution of the sales contract or service contract	We will process your data for the time period needed to manage the purchase of the products or services you have acquired, including possible returns, complaints or claims related to the purchase of the specific product or service.
3. Customer Service	We will process your data for as long as necessary to satisfy your request or application.
4. Marketing	<p>We will process your data until you unsubscribe or cancel your subscription to the Newsletter.</p> <p>If you participate in promotions, we will retain your data for a period of 6 months from the end of the promotion.</p>
5. Usability and quality analysis	We will process your data during the period which we take a promotion/action or a specific quality survey or until we anonymize your browsing data.

Regardless of how we process your data for the time strictly necessary to achieve the respective purpose, we will then keep it properly stored and protected for the period during which liability could arise from the processing, in accordance with the applicable law. **Once the limitation period for each claim has expired** , we will proceed to delete the personal data.

5. WHO WE SHARE YOUR DATA WITH:

In order to fulfill the purposes stated in the Privacy Policy, it is necessary to give access to your personal data to contracted **legal entities or natural persons** who support is in the services we offer you, namely:

- **Financial Institutions** ,
- Fraud detection and prevention **organisations**;
- Technology **Service Providers**,

- Partners and providers **of logistics, transportation and delivery** services;
- Providers of customer service-related services.
- Partners and service providers related to **marketing and advertising**.

6. YOUR RIGHTS:

We are committed to maintain the confidentiality of your personal data and **to ensure that you can exercise your rights. With you in mind, we as the Data Controller have agreed that you can exercise your rights** free of charge **by writing us an email to** a unique email address (info@londessa.gr), simply stating to us the reason for your request and the right you wish to exercise. Where we consider it necessary to confirm your identity, we may request a copy of a document proving your identity.

In particular, regardless of the purpose or the legal basis on which we process your data, you have the following rights:

- Ask us for **access to** the data we have about you. We remind you that if you are a registered user of our Website, you can also check this information in the section corresponding to your personal data.
- Ask us to correct **the data we have. Remember that if you are a registered user of our Website, you can also access the section corresponding to your personal data to modify or update your personal data. In any case, please note that by actively providing your personal data to us** in any way, you warranted that these are **true and accurate and** agree to notify us of any change or modification thereof. The sole responsibility for any loss or damage caused to our Website or to the person who is responsible for our Website or to any third party, due to filling in incorrect, inaccurate or incomplete information in the registration forms, lies with the user. Please remember that as a general rule you should only provide your own personal data, and not third party's data, except to the extent permitted under this Privacy Policy.
- Ask us to **delete** your data to the extent that it is no longer necessary for the purpose for which we need to continue processing it as we have already explained to you above or when we are no longer entitled to process it.

- Ask us to cancel or restrict **the processing of your personal data, which means that in some cases you can ask us to temporarily suspend the processing of the data or keep it beyond the required period when you need it.**
- If you have given us **your consent** to process your data for any purpose, **you also have the right to withdraw it at any time.**
- Where we are entitled to process your data on the basis of your **consent** or for the **performance of the contract**, you will also have the right to request portability of your personal data. This means that you will have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format; in order to transmit them directly to another legal entity without hindrance on our part.
In addition, where the processing of your data is based on our legitimate interest, **you will also have the right** to object to **the processing of your data.**

We inform you of your right to **lodge a complaint** to the **competent regulatory authority**, namely the **Hellenic Data Protection Authority**:

http://www.dpa.gr/portal/page?_pageid=33,211532&_dad=portal&_schema=PORTAL

7. CHANGES TO THE PRIVACY POLICY

We may modify the information contained in this Privacy Policy when we deem it necessary. In the event that we do so, we will notify you with various ways through our Website (for example, through a banner, pop-up window or push notification) or we may even send you a notification to your email address when such change is important to your privacy, so that you can review the changes, evaluate them and, where applicable, object to or unsubscribe from a service or feature. In any case, we suggest that you check this Privacy Policy from time to time in case we make minor changes or introduce an interactive improvement, taking advantage of the possibility that you will always find it as a permanent point of information on our Website.

8. COOKIE INFORMATION

We use cookies and similar devices to make it easier for you to navigate through our Site, to understand how you interact with us and, in some cases, to be able to show you ads based on your browsing habits. Please read our Cookies Policy to understand in more detail the cookies and similar devices we use, their purpose and other information of interest to you.