PRIVACY POLICY

Last Updated: May 22nd, 2018

1. SECURITY MEASURES

At https://athenstransferservices.com/ (hereinafter "**Company**") we care about protecting your personal data and we wish to be open and transparent about how they are processed. For this reason, we have developed this Privacy Policy in which we explain how we process and protect your personal data. The personal data that users voluntarily submit through our website are intended solely to safeguard the operation of provided services and the legitimacy of the respective transactions and may not be used by any third parties that do not comply with the provisions of the General Data Protection Regulation (EC 2016/679 GDPR), protection of privacy in the electronic communications sector (2009/136/EC amending 2002/58/EC), as it currently applies to the protection of privacy and the processing of personal data.

Controller

The controller for the processing of personal data in accordance with the applicable legislation is: **Michail Valvis** (hereinafter referred to as Company), headquartered in **116B Egaleo str, Piraeus, 18544, Attica, VAT 118306725**.

This Policy forms an integral part of the Terms of Use. The latest policy update appears on top of the first page of this Policy. The Company manages the personal data of its users in accordance with national, Community and international law on the protection of persons concerning the processing of personal data. These terms are subject to change, so website users are kindly requested to read them regularly. Please visit and read this Policy regularly, as we may modify it over time.

We use the popular SSL (Secure Socket Layer) method on our website in conjunction with the highest encryption level supported by the browser. This is a 256-bit encryption. If your browser does not support 256-bit encryption, we will use 128-bit v3 technology instead. Whether a single page of our website is encrypted is shown by the closed representation of the key or lock icon in the lower status bar of your browser.

The Company also takes appropriate technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or total loss, destruction or unauthorized third party access. Our security measures are continuously improved in line with technological developments.

The Company takes every reasonable step to safeguard the personal data of its users by applying strict security measures. However, users are informed that sending confidential information via electronic mail services is by no means safe, as it involves the risk that this information may be read by unauthorized third parties.

Storage period of your data

The data you provide are retained and stored by us only for as long as it is required to fulfill the purpose for which you have disclosed your data to us, in compliance with the applicable laws. In any case, you have the right to withdraw your consent at any time with future effect.

Where do we store your data?

The data we collect from you are stored within the European Economic Area.

2. USERS' RIGHTS

2.1 Summary of your Rights under the Applicable Law on Personal Data Protection.

Users who have disclosed their personal data to the Company have the following rights:

2.2 Right of access:

Under **Article 15 of the GDPR**, you have the right to request information about the personal data that we are processing. Specifically, you have the right to request from us information concerning the purposes of processing, the category of personal data, the categories of recipients to whom the data have been disclosed or the envisaged storage period, the existence of the right to request rectification, erasure or restriction of personal data processing or objection to such processing. To this end, you can send us e-mail at info@athenstransferservices.com.

2.3 Right to rectification:

Under **Article 16 of the GDRP**, you have the right to request the rectification of your personal data if they are inaccurate or the completion of incomplete data by sending an e-mail at info@athenstransferservices.com.

2.4 Right to erasure:

Pursuant to **Article 17 of the GDPR**, you have the right to require that we erase your stored personal data processed by the Company, in particular when:

- Your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The processing of your data is based on your consent and you withdraw this consent.
- Your data were unlawfully processed.
- This right shall not apply in particular when:
- The processing of your data is necessary for the establishment, exercise or defense of legal claims.
- Processing of your data is necessary for the compliance with a legal obligation to which the Controller is subject to.

In any case, we will inform you whether your request was satisfied or not, thereby providing the respective justification.

In order to exercise this right you can send us an e-mail at info@athenstransferservices.com.

2.5 Right to object:

Pursuant to **Article 21 of the GDPR**, you have the right to object to the processing of your personal data based on the Company's legitimate interest. In this case, we shall no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if processing is necessary for the establishment, exercise or defence of legal claims.

In order to exercise this right you can send us an e-mail at info@athenstransferservices.com.

2.6 Right to object processing for direct marketing purposes:

You have the right to object the processing of your personal data for direct marketing purposes. You can submit your request as follows:

- By following the instructions that accompany each e-mail with promotional content
- By sending an e-mail at info@athenstransferservices.com.

2.7 Right to portability:

In accordance with **Article 20 of the GDPR**, where the Company processes personal data by automated means based on your consent or on a contract, you have the right to receive a copy of your data in a structured, commonly used and machine-readable format. You can also request the direct transmission of your data to a third party. The above right concerns only personal data that you have provided to us.

In order to exercise this right you can send us an e-mail at info@athenstransferservices.com.

2.8 Right to restriction of processing:

Pursuant to **Article 18 of the GDPR**, you have the right to restrict the processing of your personal data in the following cases:

- When you contest the accuracy of your personal data, up to the point where the Company verifies the accuracy of these data.
- When the processing of your data is unlawful and you oppose their erasure and request the restriction of their use instead.
- When the Company no longer needs your personal data for the purposes of the processing, but you require these data for the establishment, exercise or defence of legal claims.
- When you object to the processing of your data by the Company based on the legitimate interest of the Company and up to the point where the existence of the Company's unlawful grounds overriding your freedoms or rights is verified.

In order to exercise this right you can send us an e-mail info@athenstransferservices.com.

2.9 Right to lodge a complaint with a supervisory authority:

As a data subject you can exercise the rights laid down in Regulation (EU) 2016/679 at any time, including the right to information and access, rectification, erasure (right to be forgotten), restriction of processing, portability and the right to object to processing using the appropriate forms. These

rights are exercised by sending an email to the Controller at info@athenstransferservices.com free of charge unless they are repeated frequently and involve administrative costs for us, in which case you will be charged the respective cost. If you exercise any of these rights, we will take every possible step to satisfy your request within thirty (30) days from the date the request is received, whereas we will inform you whether your requested was satisfied or not, thereby providing the respective justification.

You have the right to file a complaint with the Personal Data Protection Authority for issues concerning the processing of your personal data. For information about the competence of the Authority and how to file a complaint, you can visit its website (www.dpa.gr » Citizen Rights » Complaint to the Hellenic DPA) where detailed information is available.

3. COLLECTION AND USE OF DATA

3.1 The Company uses the data it collects for legitimate and lawful purposes associated with the fulfilment of its legitimate interests and shall not transfer, sell, assign or exchange them with any third parties. In addition, it shall take all reasonable steps to ensure that the processing of personal data is reliable, accurate and complete.

3.2 In the event that website users voluntarily provide personal information (e.g. name, address, telephone number or e-mail address), the Company may collect it, store it and process it for the following purpose.

3.3 The purpose of the processing is to communicate with the data subjects based on their consent, in order to provide information to interested parties about our projects, information on upcoming events, various educational news and circulars or if visitors wish to become members of our website in order to be able to use its services, such as receiving e-newsletters or informative material for promotional purposes that advertises the company's services to interested parties.

3.4 The Company is the sole recipient of personal non-sensitive data. You can contact the webmaster by e-mail at info@athenstransferservices.com.

3.5 The Company, provided that users give their consent, collects personal data when:
You fill in your details on the relevant contact form from which the following data are collected:

- Name
- Email address
- Phone number
- Town/City
- Country

3.6 The data are collected and used for the fulfilment of the Company's purposes as stated above, whereas the legal basis for the processing pursuant to **Article6 paragraph 6 of the Regulation** is the

exercise of the legitimate interests of the Company. In any case, you have the right to withdraw your consent concerning the processing of your data at any time, according to the procedure outlined previously.

How long do we keep your personal data for?
We will retain your personal data for direct marketing purposes unless you withdraw your consent or oppose the use of your personal data for direct marketing purposes.

3.7 eNewsletters
Once users have filled in the respective field and have consented to receive this informative and/or promotional material for advertising purposes, the email address you submit to us will be forwarded to MailChimp/Elasticemail or another services & marketing provider, via e-mail. You have the right to withdraw your consent at any time by sending an email at info@athenstransferservices.com, and the right to object to the use of your personal data for direct marketing purposes or to receive our enewsletters. In every newsletter you receive, you also have the option to unsubscribe by clicking a link at the bottom of the email page. Your email address will be retained in the above databases unless you explicitly request its removal. You can do this by using the unsubscribe links contained in any enewsletters we may send to your email or by requesting its removal via email. When requesting its removal via email, please send us your message using the email account you have registered with in the mailing list.
If you are under 16, you should obtain the consent of your parents, guardians or holders of parental responsibility before subscribing to our enewsletter.
If you have given us your explicit consent to use your personal data for advertising or information purposes, we will use your data for this purpose unless you withdraw your consent.
If your email address remains in our database, you will receive enewsletters from us on a regular basis.

4. TRANSFER AND DISCLOSURE OF PERSONAL DATA

4.1 The Company shall not sell, lease or in any way publish and/or disclose the personal data of website users to any third parties.

4.2 The Company may transfer its users' personal data to third party legal and/or natural persons only if (not all terms apply at the same time):

- It has the users' explicit consent to transfer personal data.
- The transfer of personal data to legal and/or natural persons who are the Company's associates is necessary for the fulfilment of the users' requests. The legal and natural persons who are the Company's associates have the right to process the personal data that the website users submit to it only to the extent that it is absolutely necessary in order to support the Company's services.
- It is enforced due to compliance with the relevant provisions of the law as regards to the competent authorities alone.

5. MONITORING OF INFORMATION

5.1 Information that we receive automatically when you visit our website.

We may collect behavioural monitoring data from the website, such as how you use it, what pages users visit, the time they spend on the website, the number of pages visited, from which websites they were linked to our corporate website. This data may be stored in third party services such as Google Analytics for the purpose of improving promotional activities undertaken by the company. These data do not identify users and this information is retained for a period of up to two (2) years. When you visit the website, the browser sends data to our servers. This information may include the following elements:

- your IP address,
- the date and time of your visit to the website,
- the referring URL (i.e. the website from which users originated),
- the pages you have visited on our website,
- information about your device and your web browser (type of web browser and version, operating system, etc.).

5.2 When using this website, data are collected and stored in the log files of our server such as the users' IP address, their browser, their operating system, the date and time of each call to our servers and other similar information. These data cannot identify users, but are necessary in order to monitor the smooth operation of our servers, as well as to ensure the website's operation. Consequently, and provided we have received your consent according to the above terms, we may provide this information to advertisers and other associates, to improve our services or to provide additional services. This information cannot be linked to the identity or other personal data of individual users. We allow third parties to display ads and/or collect certain anonymous information when visiting the website. These companies may use anonymous, non-personally identifiable information during your visits to the website or other websites in order to provide advertisements for services that may be of interest to you.

5.3 Third Party Applications - Google Analytics (Google Inc.)

For advertising purposes, traffic data are provided to third party services, such as Google and Facebook platforms in order to allow the display of promotional messages. These data are retained for up to 2 years. Google Analytics service is provided by Google Inc. ("Google") and uses the data collected to monitor and review the use of this application, to report on its activities and share it with other Google services. Google can use the data collected to create a context and customize the ads of its own ad network. Personal data are collected: Cookies and User Data.

5.4 Social media

We use — pursuant to Article 6 paragraph 1 of the GDRP — social plugins on our website from social networks such as Facebook, Twitter and Instagram to make our website more popular. This commercial purpose must be regarded as a legitimate interest under the provisions of the GDRP. The

respective providers shall be responsible for this function that falls under personal data protection. We integrate plugins using the so-called "double click" method to safeguard the protection of our website visitors in the best way possible.

a) Facebook

On our website, Facebook plugins are used to personalize its use. That is why we use the "LIKE" or "SHARE" button. This option is offered by Facebook.

If you visit a website page that uses such a plugin, your browser creates a direct link to Facebook servers. The content of the plugins is transferred from Facebook directly to your browser which embeds it into our website.

By integrating plugins, Facebook receives information that your browser has accessed from the respective page of our website, even if you do not have a Facebook account or have not logged into Facebook. This information (including the IP address) is transmitted by your browser directly to a Facebook server in the US and stored there.

If you sign into Facebook, Facebook can link the visit to our website directly to your Facebook account. If you interact with plugins, for example by pressing the "LIKE" or "SHARE" button, the corresponding information is transmitted directly to a Facebook server and stored there. The information will also be published on Facebook and will be displayed to your friends on Facebook. Facebook can use this information for advertising purposes, market research and personalized pages on Facebook. For this purpose, Facebook creates user profiles, regarding interests, relationships, etc, to evaluate the use of our website in connection with the advertisements that appear on Facebook, to inform other Facebook users about your activities on our website and to provide other services associated with the use of Facebook.

If you do not want Facebook to link the data collected through our website to your Facebook account, you must sign out of Facebook before you visit our website.

For the purpose and scope of the data collection and the subsequent processing and use of data from Facebook, as well as the relevant rights and legislation concerning the protection of your privacy, see Facebook’s privacy policy (https://www.facebook.com/about/privacy /).

b) Twitter

On our website, Twitter Inc. (Twitter) plugins are used. Twitter plugins (tweet button) can be identified by the Twitter logo on our website. An overview of the tweet buttons can be found here (https://about.twitter.com/resources/buttons).

When you visit a website page that contains such an add-on, a direct link is created between your browser and the Twitter server. Twitter receives the information you have visited on our site with your IP address. If you click the tweet button on Twitter while you are logged into your Twitter account, you can link the contents of our pages to your Twitter profile. This allows Twitter to link your visit to our pages with your user account. Please note that as providers of our webpages we do not know the content of the data transferred and how they are used by Twitter.

If you do not want Twitter to link your visit to our pages, please log out of your Twitter account. More information can be found under Twitter's privacy policy (https://twitter.com/privacy).

c) Instagram

Our website uses Instagram plugins, provided by Instagram LLC., 1601 Willow Road, Menlo Park, CA 94025, United States of America ("Instagram").

Plugins are labeled with the Instagram logo, for example the Instagram camera icon.

When you visit one of our website pages that contains such an add-on, your browser is linked directly to Instagram servers. The content of plugins is transmitted by Instagram directly to your browser and integrated into our page. By integrating plugins, Instagram receives information that your browser has accessed from the respective page of our website, even if you do not have a profile on Instagram or you are not logged into Instagram.

This information (including IP address) is sent by the browser directly to an Instagram server in the U.S. and is stored there. If you are logged on Instagram, Instagram can directly associate your visit to our website with your Instagram account. If you interact with plugins, for example, by pressing the "Instagram" button, this information is sent directly to an Instagram server and stored there.

The information will be registered to your Instagram account and will appear there in your contacts.

If you do not want the information collected through our website to be directly linked to your Instagram account, you should sign out of Instagram before visiting our website.

For more information, see Instagram's Privacy Policy (https://help.instagram.com/155833707900388).

6. COOKIES

6.1 Cookies are small text files that contain information stored on your computer's browser and can be removed at any time. They can help us identify your computer next time you visit our website or activate certain features on our web pages. Cookies are classified in the following categories:

Strictly necessary cookies
Functionality cookies
Performance cookies
Targeting/advertising cookies

6.2 For the smooth operation of its web pages, the Company uses cookies. Cookies are text files that are stored by the users' browser on their computer. By using cookies, the Company may provide services that would not have been available otherwise. Users can delete cookies from their browser, as well as disable them.

If you do not wish to accept cookies, you have the following options:

- Change your browser settings to delete or prevent cookies from being stored on your computer or portable device without your explicit consent. The help section in your browser will provide you with information on how to manage your cookie settings.
- Change the cookie settings in relation to the website by clicking on the "Cookies" link at the bottom of the web page.

The Cookies we use

	Use/Functionality
Session cookie	It is only saved on registered users' computers after they are logged in and is deleted when the browser is closed
Persistent login cookie	It is only saved on registered users' computers who have activated the "Stay Connected" option when logging in. This cookie is deleted only if the user chooses to disconnect from the web page ("Disconnect" option in the main menu). Note that the session associated with the specific cookie has some restrictions regarding access to certain pages of https://athenstransferservices.com/ For example, to modify your profile data you need a session cookie, so you will be prompted to re-enter your email address and your password.
viewed_cookie_policy	It is used to display the message about accepting cookies and saving the users' choice. It is valid for 1 year.
has_js	It is stored on the computers of all website visitors for the duration of the session. It is deleted once users leave our website (close the browser or tab) and allows the website to know whether the visitors' browser supports Javascript.
Google Analytics cookies	They are classified under third party cookies and are saved on the computers of all website visitors. They collect information on how visitors use our website and the duration of their storage is determined by Google's user policy. These cookies collect information anonymously, including the number of website visitors, the origin of the visitors and the pages they have visited in our website. We use this information to compile reports that help us improve our website. For more information: http://www.google.com/intl/en_uk/policies/privacy

More information about deleting or managing cookies is available at www.aboutcookies.org.

7. MINORS UNDER 16

7.1 We do not knowingly collect personal information from minors under the age of 16 through our website without the prior consent of parents/guardians and/or holders of parental responsibility.
If we find that we have collected any personal information from a minor under the age of 16 without a verifiable parental consent, we will delete the information from our database as soon as possible. If you think we may have collected information from a minor under the age of 16, please contact us.

8. PRIVACY POLICY UPDATES AND CHANGES

This privacy policy is effective from May 25th, 2018.

Our privacy policy may change as a result of further developing our website and its offers, or due to changes in legal or official requirements. You can view and print this privacy policy at any time at https://athenstransferservices.com/files/privacy-policy.pdf.