

ALG PRIVACY NOTICE

INTRODUCTION

ALG MANOUSAKIS LAW FIRM (hereinafter “ALG”, “we”, “our” or “us”) is incorporated in Greece (Athens Bar Association 80513) and sited at 16, Laodikias Str. | P.O. 115 28 | Athens. We are committed to being transparent about how we collect and use personal data and to meeting our data protection obligations under the General Data Protection Regulation EU 679/2016 (hereinafter “GDPR”). Please read the following privacy notice carefully to understand how we collect and use your personal data and the rights you have in relation to this personal data.

ALG is committed to preserving the privacy of all visitors to <https://www.alg.gr/> (the “Website”) and to protecting any personal information that you may provide to us. Please note that ALG does not collect any personal data of the Website’s users in an automatic way, except of those that the users provide, using the e-mail hyperlinks of the Website.

We provide this privacy notice (hereinafter “Privacy Notice”) to help you to understand what we may do with any personal information that we obtain from you.

WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

ALG is the “data controller” for the purposes of GDPR and this means that we are responsible for deciding how we hold and use personal information about you.

References to “processing” contained within this Privacy Notice can mean any operations performed on personal data, for example collection, storage, recording, alteration, retrieval, restriction or erasure.

THE PURPOSE OF THIS PRIVACY NOTICE

The purpose of this Privacy Notice is to explain how we may collect and process personal data about:

- Our clients or contacts;
- Individuals for the purposes of recruitment or placements;
- Visitors to ALG offices; and
- Suppliers.

DATA PROTECTION PRINCIPLES

We comply with all applicable data protection laws and regulations which stipulate that personal data we hold about you must be:

- (a) Used lawfully, fairly and in a transparent way;
- (b) Collected only for valid purposes that we have clearly explained to you, and not used in any way that is incompatible with those purposes;
- (c) Relevant to the purposes we have told you about and limited only to those purposes;
- (d) Accurate and kept up to date;
- (e) Kept only for as long as necessary for the purposes we have told you about; and
- (f) Kept securely.

In this context, under GDPR “personal data” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

According to the above GDPR definition, personal data does not include data which has been anonymized.

HOW WE USE PERSONAL DATA

ALG collects and processes a range of personal data in a number of ways, and may use this information for:

- The provision of requested information or legal services to our clients;
- Maintaining and developing our relationships with clients and third parties;
- To improve our services;
- Facilitating our internal business operations including accounting, billing, collections, and payments;
- Fulfilling our legal, regulatory and professional obligations;
- Sending invitations for corporate hospitality and other events;
- Placing and maintaining our insurances; and
- Recruitment.

This is not intended to be an exhaustive list and we may use personal data provided to us for related and/or ancillary purposes.

HOW WE COLLECT PERSONAL DATA

Whilst you are free to decide whether to provide us with personal data, please note that we may not be able to provide you with legal services without it.

We may collect personal data about you in a number of different ways including, but not limited to the following:

- In the course of our engagement for the provision of legal services;
- From business cards;
- From attendance at seminars and/or events organized or hosted by us;
- When we contract with suppliers or service providers for the provision of services to us; and
- Through third party agencies, or information available in the public domain.

THE TYPES OF INFORMATION WE COLLECT

Performance of legal services

The types of personal data we collect in the course of and in connection with the provision of legal services may include:

- Your name, address and contact details, including personal and business email addresses and telephone numbers;
- Identification documents (which may include information relating to your date and place of birth) and/or other governmental identification numbers for the purposes of complying with regulatory or legislative requirements;
- Details of your current and previous employment, directorships and shareholdings; and
- Details of your bank account for the purposes of billing and collections.

Recruitment

In addition to the above, if you apply to work for ALG we may collect the information set out below:

- Details of your qualifications and skills;

- Previous employment history, references, and information about your remuneration;
- Details of your bank account, national insurance number or other governmental identification numbers, tax code and your right to work;
- Information about medical or health records; and
- Other personal data we may require complying with the national legislative and/or regulatory requirements.

Events

From time to time, we may have photographers present at our events, where this is the case, we will notify you in advance.

Visitors to ALG offices

When attending our offices, you may be asked to provide identification documents to satisfy security requirements of the building. This information is not collected or processed by ALG.

COOKIES USED IN THIS WEBSITE

In order to make this site function properly, our Website sometimes place small data files called cookies on your device. A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. There are various types of cookies, some devised to make use of the website more efficient and to improve the browsing experience of the user, others enabling particular functions to operate.

Our website uses only technical cookies, those that are necessary for the operation of our Website. They allow you to browse the website and make use of the features that we provide you without identifying you as an individual. All data is collected and aggregated anonymously.

Here is a list of the technical cookies used by our Website:

Cookie Name	Purpose	Retention Period
cookieconsent_status	Used to get the system informed if you have accepted the use of cookies.	1 year

Session cookie	Records the web site visits and identifies any malicious use (e.g. DDOS attacks)	Expires when the browser is closed
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ON WHAT LEGAL BASIS WE PROCESS YOUR PERSONAL DATA

Our legal basis for the processing of personal data is our legitimate business interests, although we will also rely on contract, legal obligations and consent for specific uses of personal data.

We will rely on contract if we are negotiating or have entered into a legal contract or an engagement for legal services with you, your organization or an affiliated legal entity.

We will rely on legal obligations if we are legally required to hold information on you to fulfil our legal or regulatory obligations.

In addition to the above, we may use your personal data where you have provided your consent to such use or we are otherwise required to do so in compliance with our regulatory obligations.

Change of purpose

We will use your personal data only for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

WHO WE SHARE YOUR PERSONAL DATA

We may share your personal data with:

- Legal Counsel, correspondent law firms, other legal specialists, consultants or experts (including arbitrators/mediators and notaries);
- Our Accountants or Auditors for auditing and accounting purposes;
- Regulators, courts and law enforcement agencies as necessary;
- Third party service providers; and in doing so, we will keep the systems and processes of third party service providers under review to monitor the confidentiality, integrity and security of your personal data is maintained when being handled by any such service provider; and
- Other third parties where we have your express consent to do so.

WHICH COUNTRIES WE TRANSFER YOUR PERSONAL DATA TO

The personal data that we collect from you shall not be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). Although, in order to provide our services, we may need to transfer your personal information to locations outside of Greece. If we transfer your personal data to a location outside the EEA, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection legislation.

INFORMATION SECURITY

ALG takes the security of your personal data seriously. ALG has internal policies and controls in place to try to ensure that your personal data is not lost, accidentally destroyed, misused or disclosed. We will take reasonable steps to ensure that the information that we hold about you is kept confidential and secure.

Where ALG engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organizational measures to ensure the security of personal data.

We have put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

HOW LONG WE KEEP YOUR PERSONAL DATA

We will only retain your personal data for as long as is reasonably necessary in the circumstances and in compliance with our legislative and regulatory requirements.

YOUR RIGHTS REGARDING YOUR PERSONAL DATA

As a data subject, you have a number of rights pursuant to GDPR and other applicable data protection legislation.

You have the right to be informed of how your personal data is being processed. Furthermore, you are entitled to request:

- access to the personal information we hold about you (commonly known as a “data subject access request”),
- rectification of your personal data (this enables you to have any incomplete or inaccurate information we hold about you corrected). It is important that the

personal data we hold on you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us. Should you wish to amend the personal data that we hold for you, please contact us at dataprivacy@alg.gr. We will not be responsible for any losses arising directly or indirectly from any inaccurate and/or incomplete information provided to us by you.

- erasure of a certain category (or categories) of your personal data, (if ALG is no longer under a legal obligation to process such personal data. ALG can refuse to delete your personal data if in its view it requires the information for defense of legal claims against it or its group entities),
- the restriction of our processing of that personal data (this enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it),
- your personal information be transmitted to another organization (commonly known as the right to portability).

Amongst the above-mentioned rights, you reserve the right to object to the processing of your personal data. If you object, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. Withdrawal of previously given consent will have effect for the future and will not affect the lawfulness of processing based on consent until the time of its withdrawal.

Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out in this Privacy Notice. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

You also have the right to lodge a complaint in relation to ALG processing of your personal information with the local supervisory authority (Hellenic Data Protection Authority – HDPA 1-3 Kifissias Str. | P.O. 115 23 | Athens | Greece | email: contact@dpa.gr | Tel. +30-210 6475600 | fax +30-210 6475628 .

Should you wish to request details of the personal data that we hold on you, please contact us at dataprivacy@alg.gr. On receipt of your request, we may need to clarify the scope of your request and/or to verify your identity before providing this information, however, we will do this promptly to ensure that there is no undue delay in complying with your request.



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CHANGES OF THIS PRIVACY NOTICE

We review this Privacy Notice regularly and reserve the right to revise it or any part of it from time to time to reflect changes in the law, information security and technology practices or in the way in which we process your personal data.

CONTACT INFORMATION

If you have any questions about this Privacy Notice, or want to submit a written complaint to us about how we handle your personal data, please contact us at dataprivacy@alg.gr.