Data Protection Policy of AIMS International Hellas S.A.

Last Amended on 22.06.2020

1. Introductory notes

This policy is provided by AIMS International Hellas S.A. ("AIMS Hellas") and is intended for individuals outside our organization with whom we interact, including Prospective Employees, Information Resources, Partners, Suppliers and Customers.

The basic definitions of the terms used in this Policy are explained in section (12) below.

For the purposes of this Policy, AIMS Hellas is the data controller. In some cases, AIMS Hellas may act as a "Data Processor" of the Personal Data that is processing.

Therefore, in those instances, different provisions of General Data Protection Regulation (EU) 679/2016 apply, with which we comply.

This Policy may be amended or updated from time to time to reflect changes in our practices in relation to the processing of Personal Data (“PD”) or changes in applicable law.

We encourage you to carefully review this Policy. In the event of any changes that may be made to the provisions of this Policy, we will keep you accordingly informed, as set forth below.

2. Personal Data Processing

Personal Data Collection Points: We may collect personal information about you, such as your name, address, and contact information. Examples of sources from which we collect Personal Data include:

- We may obtain your Personal Data directly from you (e.g. when you contact us by email or telephone or by any other means)
- We may collect Personal Data from our existing relationship (e.g. if we offer to link you with our Customers, we may collect Personal Data related to "Customer opportunities" from your resume)
- We may receive Personal Data from other members of the AIMS Hellas corporate network as long as they provide them to us

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- We may collect Personal Data that you choose to share on other platforms, including social media (e.g. we may collect information from your social media profiles as long as you have set them as public information on those mediums)
- We may receive Personal Data from third parties who provide them to us (e.g. former employers)
- We may, with your prior written consent, carry out data confirmation checks that you disclose to us

Personal Data Generation: We can also generate Personal Data for you, such as files from the interviews you participated in. These Personal Data help us provide our services and manage our legitimate business interests in pursuit of our statutory purpose.

Third Party Personal Data provided by you: In some cases, you may disclose Personal Data of other third-party individuals. For example, you may act as a source of information and comment on a candidate. Whenever you provide us with any such Personal Data, we rely on you to verify that you have the legal basis to disclose those Personal Data to us and that you comply with applicable law as well as with the terms of this policy. If you are unable to do so, please refrain from providing us with any third-party Personal Data.

Personal Data Categories: The categories of Personal Data that we may process are as follows:

Personal details: name (s), gender, date of birth / age, citizenship, photo, marital status, job title, employer, department, details of wages and benefits

Contact details: home address, work address, home phone number, work phone number, personal mobile phone number, personal email address, work email address and social media profile details

Employment background: dates and details of current and former jobs, details of current and former employers, dates of employment, job titles, job positions, experience in the field and details of any disciplinary or employment incidents

Information of individuals who have provided letters of recommendation/ recommendations: details of the recommendations that will be provided, including the relationship you may have with each of these, as well as the duration of this relationship

Background checks: details disclosed by background checks conducted in accordance with applicable law and subject to your prior express written consent, including details of prior employment, residence details, recommendation checks

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Opinions and viewpoints: your views on the candidates or participants, as appropriate

Invoicing Information: when managing invoices/payments for customers, suppliers and outsourcers, we may process financial information, such as tax IDs, invoicing address, contact details and bank accounts

Legal basis for the processing of Personal Data ("Processing"): When processing personal data for the purposes set out in this Policy, we may rely on one or more of the following legal bases:

- We have obtained your prior explicit consent to "**Process**" the data (this legal basis is used only in relation to "**Processing**" which is completely optional - not to be used in cases where the Processing is legally necessary or mandated in any other way)
- "**Processing**" is necessary for the performance of any contract with which you may enter into with us
- "**Processing**" is mandated by applicable law
- "**Processing**" is necessary to protect the vital interests of any individual, or
- We have a legitimate interest in performing the **"Processing"**, which does not in any way violate any of your interests, fundamental rights, or freedoms

Whenever we rely on this legal basis, our legitimate interests are as follows:

- our legitimate interest in managing and carrying out our business activities
- our legitimate interest in promoting our business and
- our legitimate interest in providing services to our Customers

Processing of special categories of Personal Data ('sensitive data'): We do not seek to collect or otherwise process special categories of Personal Data, except where:

- "Processing" is required or permitted by applicable law
- "Processing" is necessary for the investigation or prevention of criminal acts
- "Processing" is necessary for the constitution, exercise or defense of legal rights
- we have obtained, in accordance with applicable law, your prior explicit consent before processing sensitive Personal Data (as mentioned above); this legal basis is used only in relation to "**Processing**" which is completely optional - not to be in cases where the Processing is legally necessary or mandated in any other way

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Purposes for which we may process Personal Data:

AIMS Hellas is a consulting company dedicated to providing services in the field of Executive Search, Selection and Talent Management. In view of the foregoing, the purposes for which we may process Personal Data in accordance with applicable law, include:

- Search, Headhunting, and Evaluation Activities on behalf of clients: hiring executives, promoting our clients' job opportunities, keeping records and performing career audits
- Communication and briefing: communicating with you by any means (including email, telephone, text message, social media, in-person contact) regarding issues that may relate to you or may be of interest to you or for the purpose of obtaining market information
- Communication, management and processing of invoices, payments and accounting of financial data (invoices, contract documents) of customers, suppliers and affiliates

Profiling: In pursuit of our statutory purposes, we use and process the information we collect through the subject's CV's with the consent of the data subjects to produce ratings, which are inter alia related to the suitability of candidates for certain job positions based on parameters specified by the customer.

We recommend to our customers to interpret and use our evaluations, which we issue within the framework of the provision of our services, by their own standards. Our customers may choose to use our evaluations independently or combine said evaluations with other information available to them. The clients are exclusively responsible for the decision-making process, which will be based on whether they hire or start working with the Data subject. To that effect, we do not make any decisions on behalf of our clients - nor do we maintain exclusion lists.

The Data subject shall have the right not to be subject to a decision made solely on the basis of automated processing, including the development of profiles, which produce legal effects that affect or substantially influence him in a similar manner (Article 21 of the GDPR). AIMS Hellas hereby declares that it does not perform automated processing of Personal Data of the Data subjects, and respectively it does not use automated decision-making processes that produce legal effects that affect or substantially influence the Data subjects and result in the refusal of the provision of goods or services or in unjustified discrimination.

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3. Disclosure of Personal Data to third parties

We may disclose Personal Data to other members of the AIMS Hellas Network for legitimate business purposes (including the provision of services to you) in accordance with applicable law. We may also share aggregated demographic information with our customers and Trusted Partners for the purposes described in this Policy. We make every reasonable effort to ensure that this information is always anonymized.

In addition, we may disclose personal data to:

- legal and regulatory authorities, upon request, or for the purpose of reporting any actual or suspected breach of applicable law or regulation
- our customers, for the purpose of providing services to them, in accordance with the provisions of this policy in the context of the legitimate interest of our company
- lawyers and other outside professional consultants of AIMS Hellas network subject to binding contractual confidentiality obligations
- judicial authority, in so far as it is necessary for the exercise or defense of our legal rights
- any party involved for the prevention, investigation, detection or prosecution of criminal offenses or the enforcement of criminal penalties, including the protection and prevention of threats to public security

In case we employ a third party partner or company for the processing of Personal Data, we will ensure that the necessary Data processing agreements are signed or that specific guarantees regarding the transfer of Personal Data are being provided, by applying to their agreements, standard contractual clauses which will subject them to the following binding contractual obligations:

1. restriction of Personal Data processing in accordance with our prior written instructions
2. use of measures to safeguard the privacy and security of Personal Data
3. availability to perform compliance audits on the above conditions

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4. Personal Data Transfers

Due to the international nature of our business, we may require to transfer Personal Data to other entities on the AIMS Hellas Network and to third parties, as referred to in section (3) above, for the purposes set out in this Policy. For this reason, we may transfer Personal Data to other countries which may have different laws and Data protection requirements than those in force in the country in which you are located. More specifically, Personal Data may be disclosed to other members of the AIMS Hellas Network, to the extent appropriate, in relation to the client opportunities for which you are a candidate.

If we transmit Personal Data to other countries, we do so by obtaining your express consent on a case-by-case basis.

During all Data transfers, we always take all appropriate measures so as to ensure that the transmitted data are the minimum required for the intended processing purpose and that the conditions for legitimate and lawful processing will always be met.

5. Security of Personal Data

AIMS Hellas applies appropriate technical and organizational security measures to protect Personal Data from accidental or unlawful destruction, loss, tampering, unauthorized disclosure, unauthorized access and other unlawful or unauthorized forms of processing, in accordance with applicable law.

For your part, you are responsible for ensuring that the Personal Data you have provided us with have been securely transmitted.

In addition, AIMS Hellas shall take steps to ensure that any individual acting under the supervision of the Data controller having access to Personal Data, will only process such data under the instructions of the Data controller and will limit access to your personal information to authorized employees.

Indicative security measures applied by AIMS Hellas are as follows:

A. Organizational Measures

1. Employee management process - assignment of roles to all individuals involved in Data processing activities

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2. Information system management
3. Employee training on the protection of Personal Data, information provided to all employees regarding the company's policies/processes
4. Monitoring of Data processors
5. Setting up of a deletion/destruction of Data process
6. Monitoring of Data breach incidents
7. Monitoring of controls/security measures

B. Technical Measures

1. Access controls
2. Backup Data process
3. Modification of workstations
4. User log files, security incident logs
5. Communications security
6. Management and protection of portable Data storage assets
7. Software and applications safeguards
8. Management of amendment controls

C. Environmental Security Measures

1. Physical access controls
2. Environmental security - protection from natural disasters
3. Document exposure to threats
4. Protection of portable Data storage assets

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6. Accuracy of Personal Data

We will ensure that the Personal Data that we process, are accurate and, where necessary, updated. For our part, we take every reasonable measure to ensure that:

- the Personal data we process are accurate and, where necessary, up to date
- in case any of the Personal Data we process are inaccurate (taking into account the purposes for which they are processed), we will proceed without undue delay to their deletion or correctness

From time to time we may ask you to confirm the accuracy of your Personal Data.

7. Data Minimization

We are applying all reasonable measures to ensure that the Personal Data that we process, are limited to those necessary for the processing purposes related to this Policy.

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8. Data Retention

The Data retention period depends on the legal basis of processing, as set out in detail below:

- In case the legal basis for processing is the exercise of legitimate interest, the processing of Personal Data is carried out for as long as it is considered necessary for the fulfillment of the intended statutory purpose of AIMS Hellas (in this instance 5 years, a Data retention period deemed sufficient for the company's intended purposes as laid out in this policy) and until such time the limitation period of any related claims has expired (article 6 of GDPR)
- In case the Personal Data of the Client Information are provided under their own consent such as in the case of candidate employee process, we shall retain their Data until the granted consent by the data subject has been withdrawn. In case the consent is withdrawn for any valid reason, we shall retain them for as long as it is required until the limitation period of any related claims expires (article 6 par. a of GDPR)
- In case the lawful basis for processing is the performance of the contract, we shall retain your Data for as long as you retain the contractual relationship with AIMS Hellas in hard copy and in electronic form or we shall retain them for as long as it is required until the limitation period of any related claims expires (Article 6 par. b of GDPR)
- In case where the processing of the Personal Data is based on a legal obligation (Article 6 of GDPR), the Data retention period is set in accordance with the pertinent legislation and the limitation period for any inspections that may be performed by competent authorities.

9. Rights of the Data Subjects

Pursuant to applicable law, your rights in relation to the processing of your Personal Data include the following:

- Right to information: the Data controller is obliged to provide the Data subject with a range of information, including the identity and contact details of the controller, DPO contact details assuming his appointment is mandatory and set by the company, the purpose and the legal basis of the processing, the recipients of the Data disclosed and any transfers

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thereof, the length of time the Data is retained, the rights of the subject (Articles 13, 14 of GDPR)

- Right of access: the Data subject has the right to know whether Personal Data are being processed or not as well as to have access to information for the purpose of processing, the categories of Personal Data, the recipients of the data disclosed, the data retention period, the rights of the subject, profile development (Article 15 of GDPR)
- Right of rectification: the subject has the right to ask the controller to rectify or supplement its Personal data without undue delay (Article 16 of GDPR)
- Right to erasure ("right to be forgotten"): the Data subject has the right to request from the controller to delete the Personal Data without undue delay when one of the reasons referred to in the Regulation occurs (e.g. data is no longer necessary for the purpose originally processed, the subject withdraws his consent or opposes the treatment and there is no other legal basis for processing where the processing is unlawful (Article 17 of GDPR)
- Right to restriction of processing: the Data subject has the right to pinpoint stored Personal Data in order to request the limitation of their processing in the future when one of the reasons stated in the regulation (e.g. whenever the accuracy of data is questioned or when the processing is unlawful and a Data subject is opposed to it, Article 18 of GDPR)
- Right to data portability: the Data subject has the right to receive Personal Data in a structured, commonly used and machine-readable format and to transmit it to another Data controller (Article 20 of GDPR)
- Right of opposition: the Data subject has the right to object at any time and for reasons related to his / her status, in the processing of its Personal Data. In such cases, AIMS Hellas will act as the "Data processor" of the Personal Data contained therein business data. Therefore, in those cases, different provisions of General Data Protection Regulation (EU) 679/2016 apply, with which we comply
- The Data subject has the right not to incur a decision made solely on the basis of automated processing, including profiling process which produces legal effects concerning them or similarly significantly affects them (Article 22 of GDPR)
- Right to lodge a complaint about the processing of Personal Data with the Data Protection Authority

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These rights may be exercised only in cases where AIMS Hellas acts as a Data controller, and in particular: (a) the processing of Personal Data of prospective employees for the purpose of assessing the likelihood of possible professional cooperation; (b) the processing of Personal Data relating to pursuit of its intended statutory purposes (provision of headhunting and evaluation services); (c) processing of data of existing customers/suppliers/affiliates in the course of processing requests.

In case you exercise any of the above rights, we will take all appropriate measures available for the satisfaction of your request within thirty (30) days following the confirmed receipt of the relevant request. We may either inform you on the acceptance of your request or on any objective grounds that hinder the processing of your request related to the exercise of your rights under GDPR.

In case however the aforementioned rights are exercised excessively and without good cause thus causing us administrative burden, we may charge you with the cost related to the exercise of the respective right.

In addition, you have the right to contact the Greek Data Protection Authority, which may receive written complaints as per its protocol at its offices at 1-3 Kifissias Street, PC. 115 23, Athens or via email (complaints@dpa.gr) according to the instructions listed on their webpage.

10. Obligations of the Data Subjects

If and to the extent that you are a Candidate, we rely on you to provide us with complete and accurate personal information so that we can provide the right services to you and our clients.

As long as you act as a source of information, please make sure that you are legally able to disclose to us Personal Data as set forth in this Policy.

11. Point of contact

If you have any comments or questions regarding any of the information in this Policy or any other matter related to the Data processing by AIMS Hellas please contact our company at: AIMS International Hellas SA., 45, Michalakopoulou street, 11528, Athens, 00302107221568 or by e-mail: aimsh@aims-hellas.gr.

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12. Definitions

"Candidate" shall mean a candidate or potential candidate for a job position of a Client

"Customer" means any customer of AIMS Hellas or any other member of the AIMS Hellas Network

'Data subject" refers to the individual to whom the data relates and whose identity is known or can be ascertained, directly or indirectly, in particular on the basis of an identity number or one or more of the specific physical characteristics of the entity; biological, mental, economic, cultural, political or social

"Data Protection Authority", an independent public authority that has the legal authority to oversee compliance with applicable data protection laws

"Personal Data" means any information relating to a natural person on the basis of which it is identified as well as any other information through which his or her identity can be directly or indirectly verified (e.g. name, surname, ID, Tax Identification Number, Social Security Number, telephone, email). Special categories of Personal Data, are data revealing racial or ethnic origin, political beliefs, religious or philosophical beliefs, participation in trade unions, as well as genetic data, biometrics and health, sex data or the sexual orientation of the natural person. Examples of Personal Data we may process are provided in Section (2) above

"Data processing" means any operation or series of operations performed with or without the use of automated means, on Personal Data or Personal Data sets, such as the collection, registration, organization, structure, storage, adjustment or alteration, retrieval, retrieval of information, use, disclosure, dissemination or any other form of disposal, association or combination, restriction, deletion or destruction

"Data controller" means the natural or legal person, public authority, agency or other entity which, alone or in combination with others, determines the purposes and manner of processing Personal Data

"Data processor" means the natural or legal person, public authority, service or other body which processes Personal Data on behalf of the Data controller

"Special categories of Personal Data" Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or psychological condition, sexual orientation, any performed or alleged criminal action or sentence, information deemed to be sensitive in accordance with applicable law

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“Source” means any person who provides any opinion or viewpoint on the attributes of any candidate or participant for any purpose, including but not limited to the fitness of a candidate or participant for a particular role

“Third party” means any natural or legal person, public authority, agency or body, with the exception of the Data subject, processor and persons who, under the direct supervision of the Data controller or processor, are authorized to process Personal Data

“Data subject's consent” means any indication of a free, specific, explicit and fully informed will, with which the Data subject indicates that he / she agrees, by declaration or by a clear affirmative action, to the processing of Personal Data which relate to it. This consent is normally required, except for the exceptions set out in the Regulation

"Personal Data breach" means a breach of security that results in accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to Personal Data transmitted, stored or otherwise processed

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