

# **FOURLIS GROUP DATA PROTECTION - PRIVACY POLICY**

## **1. Introduction**

The natural persons visiting the website [www.fourlis.gr](http://www.fourlis.gr) (hereinafter referred to as "the Webpage" or the "Website") may be navigated in its webpages as simple visitors and for the processing of their personal data, due to this access and the use of its services, the present Policy shall apply.

Each visitor of the webpage wishing to send his/her curriculum vitae should fill in the relevant application form in the system.

The attachment of a curriculum vitae is performed under sole and absolute initiative, diligence and responsibility of the candidate, as regards the information and data included in the account and the CV, which must be true and accurate.

## **2. Definitions**

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| <b>«General Data Protection Regulation»»</b>               | Regulation (EU) 2016/679 issued by the European Parliament and the Council, dated on 27 April 2016, on the protection of natural persons from the processing of personal data and on the free movement of these data and on the repeal of the directive 95/46/EC (General Data Protection Regulation) (this text is of relevance to the EEA) (hereinafter referred to as "the Regulation").   |
| <b>«Personal Data»</b>                                     | Any information concerning an identified or an identifiable natural person ("data subject"); the identifiable natural person is the person whose identity may be identified, directly or indirectly, especially through a reference to an identity identifier, such as name, identity card number, location data, online identifier, or one or more factors applying to the physical, normal, genetic, psychological, financial, cultural or social identity of the said natural person.  |
| <b>«Special Categories Data»</b> (Sensitive Personal Data) | The Personal Data which are naturally particularly sensitive in relation to fundamental rights and freedoms of the natural persons and require special protection, since their processing framework could create significant risks to the fundamental rights and freedoms of the natural persons. The said personal data should include personal data disclosing racial or national origin, political views, religious or philosophical views or the participation in a trade union, as well as the processing of genetic and biometric data aiming at the undoubted identification of a person, data concerning the health or data concerning the sexual life of a natural person or the sexual orientation. |
| <b>«Processing»</b>  | Any act or series of acts taking place with or without the use of automated means, on personal data or sets of personal data, such as the collection, the registration, the organisation, the structuring, the storage, the adjustment or the change, the recovery, the search of information, the use, the communication through transmission, the dissemination or any other form of disposal, the correlation or the combination, the limitation, the erasure or the destruction.  |

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| «Consent» of the data subject | Any indication of will, free, specific, explicit, and in full awareness, by which the data subject declares that he/she agrees, by declaration or through an express and obvious positive act, that the personal data concerning the data subject should constitute an object for processing.  |
| «Controller»                  | The natural person or the legal entity, the public authority, the service or other body, that separately or jointly with other bodies, specify the purposes and the method of data processing; when the purposes and the method of this processing are specified by the Union law or the law of the member-state, the controller or the special criteria for his/her appointment could be provided by the Union law or by the law of the member-state. |
| «Processor»                   | The natural person or the legal entity, the public authority, the service or other body processing personal data on behalf of the controller.  |

### **3. Purpose of Processing**

The FOURLIS Group (FOURLIS Holdings SA) is the Controller for the Personal Data collected and joint controllers are named all the Group's subsidiaries (HOUSEMARKET AE-IKEA, SPORTSWEAR MARKET AEE- INTERSPORT/FOOTLOCKER, TRADE LOGISTICS AEBE, WELLNESS MARKET AE-Holland & Barrett), even if one specific employment post has been selected in one of them, since it is possible that more than one or all Group companies may have access to the same curriculum vitae, since the database and the system for the management of CVs is shared by all the companies. Purpose of the collection and the processing of these data is the evaluation of candidate and the finding of a suitable job in the Group or in any of the Group's companies.

The FOURLIS Group and the Companies of the Group shall proceed to the processing of Personal Data of the candidates in accordance with the applicable laws on Personal Data Protection, and with any other relevant law provision, aiming at the assessment, in their view, of the candidates' abilities and skills for the specific job, for which they have sent their CV, or for any other job managed or controlled by the FOURLIS Group and the Companies, for which (job) it is determined, upon processing, that these candidates have the required abilities/skills.

The FOURLIS Group and the Group's Companies declare that no other use of the personal data of the users shall take place for other purposes than those mentioned in this Policy, without prior notification and, whenever required, express consent of the data subject.

### **4. Lawfulness of Processing**

The processing of the Personal Data of the visitors for the purposes mentioned above is required in order that measures are taken, after request of the data subject, prior to the execution of the contract and, more specifically, for examining the possibility of the candidates' employment in the Group or in the Group's Companies, (article 6 par.1b of the Regulation).

Furthermore, in specific cases, the processing is required for compliance with the law, when certain information are necessary for the fulfilment of the lawful or regulatory obligations of the FOURLIS Group and of the Group's Companies.

## **5. Type of Personal Data**

The Personal Data collected directly by the candidate are: first name, surname, e-mail & mobile phone number while the candidate may submit a file with a more detailed curriculum vitae.

We do not pursue to obtain and we shall never collect data of special categories in relation to a candidate, unless this is allowed or required by the applicable laws. In extraordinary cases that such data are communicated to us, such as health data, we process these data because you communicate these to us for the support of your nomination. These data shall be submitted for processing only to the extent absolutely required for the assessment of the suitability/eligibility of the applicant for the specific job and duties or for compliance with the lawful obligation.

## **6. Data Recipients**

Recipients of these data are those responsible for each specific processing employees of the Group and of the Group's Companies.

Further, the FOURLIS Group and the Group's Companies may assign a part of or the entire processing of data to third parties, natural persons or legal entities, processing the data on their behalf as Processors. Such recipients may be: a) the company providing webpage maintenance services; b) recruitment consultants, in respect of steps required for the assessment and cover of each job position or of any other job positions, that may arise and match the experience and the qualifications of the registered users, as well as for communication purposes with them in relation to the said job positions etc.

Upon registration, access or/and processing of the personal data of the candidate's profile, the employees and authorised agents of the FOURLIS Group and the Companies of the Group, are committed to fully comply with the provisions of the Regulation as well as with the applicable laws on data protection. The FOURLIS Group and the Group's Companies shall require from the workers, webpage maintainers, as well as from their third partners to take all necessary technical and organisational measures, including the appropriate policies and procedures, so that the disclosure of personal data processed on their behalf should be prevented.

## **7. International Transmissions**

FOURLIS Group and the Group Companies shall not transmit or store the above data to third countries. The personal data collected shall be submitted for processing to servers located in the EU or in the EEA.

## **8. Technical and Organisational Protection Measures**

FOURLIS Group and the Group Companies, the processors acting on their behalf and its authorised agents/servants are contractually committed to apply the appropriate technical and organisational measures for the best possible protection of Personal Data against the random or unlawful damage or loss, alteration, illegal notification or access to them and their illegal processing in general (including the remote access), as well as for the guaranteeing of the availability- and access-recovery option. These measures aim at guaranteeing a safety level corresponding to the risk that might threaten the specific data, taking always into account the type and the importance of the data, the evolution of technology, the implementation cost and the nature, the implementation scope, the framework and the purposes of each specific processing, applying at the same time procedures for the regular testing, estimation and evaluation of the effectiveness of these technical and organisational measures. In any case, they are contractually committed to keep the Personal Data confidential and to abstain from disclosing them or allowing access to them to any third party without prior notification of the data subject, unless in cases explicitly provided by law.

FOURLIS Group and the Group Companies shall take the required technical and organisational measures for data protection, as above exposed, may not however guarantee the safety of the data that will be circulated through the website, nor through connected websites or applications. The candidates shall acknowledge and accept, as users of web services, that the transmission and sending of information via the web, always present risks.

## **9. Data Maintenance Term - Update**

In case of a candidate that has sent his/her curriculum vitae through the system, his/her Personal Data shall be kept in the database **for 24 months as of the date of registration**, and provided that the candidate does not undergo a hiring procedure. This reasonable period of time has been selected on the basis of the legal interest of the parties and the technical capabilities of the system (article 6 par.1f of the Regulation).

Each candidate wishing that his/her data are not kept for the aforementioned period of time, may exercise the right to erase them, as below provided.

## **10. Rights of the Data Subject**

Each visitor, as data subject, may exercise at any time his/her rights, as these are provided in the Regulation and especially in the articles 12 until 23 of this Regulation and the national laws, and more specifically:

- i) the right to be informed and have access to the data processed by FOURLIS Group and the Group Companies;
- ii) the right to restriction of his/her data processing;
- iii) the right to correct or erase part of or his/her entire (right to be forgotten) personal data;
- iv) the right to object, that is to raise objections against the processing of his/her personal data; and

v) the right to portability of his/her data.

His/her aforementioned rights may be exercised as follows:

- **As regards the right to access, erasure in part or in whole, correction/completion of the Personal Data and objection to processing,** FOURLIS Group and the Group Companies grant the option to the registered users to view, correct/complete their personal data through their personal account or request access, erasure in part or in whole, and correction of their data via email correspondence to the e-mail address: [dpo@fourlis.gr](mailto:dpo@fourlis.gr).
- **As regards the right to portability of the Personal Data,** FOURLIS Group and the Group Companies grant the option to receive their personal data or/and transmit them to another controller in a structured, jointly used and readable by machines form, indicated by the competent supervisory authority, by submitting a relevant request to the e-mail address [dpo@fourlis.gr](mailto:dpo@fourlis.gr).

In case of exercise of any of the aforementioned rights, FOURLIS Group and the Group Companies shall take any possible step for the satisfaction of the request within one (1) month as of its submission. In this case, the data subject shall be informed that his/her least required personal data shall be kept, for the guaranteeing of legal interests of the Group. It is clarified that in order for the exercise of the aforementioned rights be considered as valid, the identification of the applicant may be required, in order to be ensured that the Personal Data in relation to which some of the aforementioned steps / acts is requested, actually belong to the natural person applying for the specific act.

## **11. Transparency Obligation**

For any other information related to his/her data as well as their processing and protection, each Data subject may address the Data Protection Officer of the FOURLIS Group to the email [dpo@fourlis.gr](mailto:dpo@fourlis.gr) and to the hotline 0030-2106293011. In case he/she considers that he/she is not satisfied from the response or in general from the method of collection, processing and management of his/her data, he/she is informed that he/she has a right to file a termination notice to the competent supervisory authority (Data Protection Authority, [www.dpa.gr](http://www.dpa.gr), 1-3 Kifisias str. P.C.11523, Athens, tel.0030-210-6475600, email: [complaints@dpa.gr](mailto:complaints@dpa.gr))

## **12. Modifications in the present Policy**

FOURLIS Group and the Group Companies may modify the present Policy. This Policy shall apply and be effective as of June 2021.