

# Processing of Personal Data "<u>MEGAS IKE – "ADAMA MYKONOS"</u>"

# Update regarding the processing of your personal data by **"MEGAS IKE – "ADAMA** <u>MYKONOS"</u>

Our company, named "MEGAS IKE – "ADAMA MYKONOS"", headquartered in Skalado, Mykonos, 84 600, considers the protection of your privacy and personal data of paramount importance.

In this context, as the data controller, "MEGAS IKE – "ADAMA MYKONOS"" defines the purposes and the manner of processing in accordance with Regulation 679/2016 EU on the protection of natural persons with regard to the processing of personal data, on the free movement of such data, and the repeal of Directive 95/46/EC (General Data Protection Regulation, hereafter referred to as 'GDPR'), as well as the applicable legislation.

Below, we provide you with useful information regarding how we process Personal Data, which we collect as part of our business activities within the framework of the applicable legislation, as well as information regarding your rights related to the processing.

# 1. Sources of collection & Categories of personal data

"MEGAS IKE – "ADAMA MYKONOS"" collects the following categories of personal data, through, for example, its employees or associates:

#### Regenerate response

a. Identification Data	For example: Name, Surname, Patronymic, Matronymic, Date of birth, Identification number (ID card/passport), Tax Identification Number (TIN), Driver's license
	Number (TIN), Driver's license



b. Contact Information	For example: Address, Email address/correspondence address, Telephone numbers/fax numbers
c. Payment Data	For example: Bank accounts, Debit/credit cards and other banking cards

#### 2. Processing Purposes

The purposes for which the processing of the above personal data is carried out are as follows:

- a. Informing "MEGAS IKE "ADAMA MYKONOS"" about the intention of the data subject regarding the provision of hospitality and hotel services, and generally about all services that can be provided by "MEGAS IKE – "ADAMA MYKONOS""
- b. To provide the data subject with reminders and instructions regarding the coverage of "MEGAS IKE – "ADAMA MYKONOS"" and the rights and obligations of the parties prior to the commencement of the requested services.
- c. To conduct research that "MEGAS IKE "ADAMA MYKONOS"" may undertake in relation to other past or future service requests of the data subject.
- d. To ensure compliance of "MEGAS IKE "ADAMA MYKONOS"" with obligations imposed by the applicable legislative and regulatory framework, compliance with judicial decisions and response to requests from public authorities (including those located outside the country of residence of the data subject).
- e. To analyze and manage other business risks, to manage complaints and comments, within the framework of compliance by "MEGAS IKE "ADAMA MYKONOS"" with legal obligations, as well as to investigate customer satisfaction.
- f. Complying with legal obligations, as well as the establishment and exercise of legitimate rights of "MEGAS IKE – "ADAMA MYKONOS"" to protect its lawful interests and those of the companies within its Group, including the management of "MEGAS IKE – "ADAMA MYKONOS"" business operations and IT infrastructure, in accordance with its internal policies and procedures, including those related to the pricing of products and services, operation of IT systems, hosting of data and applications, data analysis, file management, and internal control processes.
- g. To promote "MEGAS IKE "ADAMA MYKONOS"" commercially, which may involve sending SMS messages, emails, and making telephone calls to the data subject (if consent is provided), in order to inform them about new services, offers, and collaborations with other companies that cover different types of services.
- h. It is explicitly noted that the subject has the right to refuse to provide consent for the aforementioned processing purpose (commercial promotion), regardless of any consent provided for any other processing purposes mentioned above.



The provision of personal data by the subject is necessary for the conclusion and subsequent execution of the requested services. The subject is not obliged to provide them; however, it is informed that the non-provision of personal data that is absolutely necessary for the provision or execution of the service may result in the inability to enter into the respective agreement or to perform certain aspects of it or provide the requested services.

# 3. Legal basis for data processing

According to the applicable legislation for the protection of personal data, the legal bases for data processing may vary depending on the case and include the following:

- i. Article  $6(1)(\alpha)$  of the General Data Protection Regulation (GDPR), which refers to the consent of the data subject for the processing of their personal data, provided that the data subject has given it written.
- ii. Article  $6(1)(\beta)$  of the General Data Protection Regulation (GDPR), as the processing is necessary for the performance of the requested services or any cooperation agreement in which the data subject is a contracting party.
- iii. Article 6(1)(στ) of the General Data Protection Regulation (GDPR), which refers to the processing necessary for the purposes of the legitimate interests pursued by "MEGAS IKE "ADAMA MYKONOS"" for its efficient operation, as these legitimate interests are described in the purposes mentioned above in paragraphs 2c, 2d, 2e, and 2f.

Specifically for the case of special categories of personal data ('sensitive personal data') described above, the collection and processing are carried out exclusively if the data subject has provided explicit consent, in accordance with Article 9(2)(a) of the General Data Protection Regulation (GDPR), for their processing for the purposes mentioned above.

# 4. Tranfer & Categories of Recipients

"MEGAS IKE – "ADAMA MYKONOS"" may transfer the data to other organizations within the Group to which it belongs, within the European Union. It will also transfer the data to other companies (following a legitimate request), to Social Security authorities (IKA/EΦKA), and to Public Authorities when required by law.

Furthermore, the data will be transferred to the affiliated providers collaborating with "MEGAS IKE – "ADAMA MYKONOS"" within the framework of its lawful operation. It is noted that the relevant transfer to public authorities constitutes a legal obligation of "MEGAS IKE – "ADAMA MYKONOS"" under Article  $6(1)(\gamma)$  of the General Data Protection Regulation (GDPR).

5. Your rights

a. <u>Rights to Access, Rectification, Erasure, and Restriction of Processing.</u> You have the right to submit a request to "MEGAS IKE – "ADAMA MYKONOS"" (as the data controller) for:

• Access to the personal data concerning you,



- Correction of inaccurate or outdated data concerning you or completion of any incomplete data.
- To request the erasure of data concerning you, in case the processing is no longer necessary for the purposes for which they were collected,
- To request the restriction of the processing of personal data concerning you,
- The portability of your data (e.g., to transfer it directly to another company).

## b. Right to object

Additionally, you have the right to object, at any time and for reasons related to your particular situation, to the processing of your personal data based on Article 6(1) of the General Data Protection Regulation (GDPR), including profiling, according to the mentioned provisions. In such cases, "MEGAS IKE – "ADAMA MYKONOS"" as the data controller will no longer process your personal data unless it demonstrates compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims.

If your personal data is being processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such direct marketing, including profiling related to such direct marketing. In such cases, "MEGAS IKE – "ADAMA MYKONOS"" as the data controller will no longer process your personal data for these purposes.

#### c. Right to withdraw your consent

You have the right to withdraw your consent at any time, without affecting the legality of the processing based on your consent before its withdrawal. However, we inform you that the withdrawal of consent for the processing of data that is absolutely necessary for the execution of the contract, and for which explicit consent is also required, may result in the inability to execute the contract in some of its aspects.

## d. The exercise of the aforementioned rights

by you requires the submission, at no cost, of a written request to the Data Protection Officer of "MEGAS IKE – "ADAMA MYKONOS"" whose contact details are provided below.

## 6. How we protect your personal data

"MEGAS IKE – "ADAMA MYKONOS"" uses appropriate technical and organizational measures in accordance with data protection legislation to safeguard your personal data. However, no transmission of data over the internet or electronic storage system can guarantee 100% security. If you have any indications that your communication with us is no longer secure, please inform us immediately at info@adamamykonos.com

## 7. <u>Retension period of personal data</u>

"MEGAS IKE – "ADAMA MYKONOS"" retains personal data for the period required for the purposes of processing or to comply with legal obligations.

## 8. Use of Cookies

In order to personalize your visit to our website and to ensure the functionality of certain



features, we use 'cookies' to collect and store data. For more information, please refer to our cookie policy, which is available **here**.

9. Your Communication with "MEGAS IKE – "ADAMA MYKONOS""

For any matter regarding the processing of your personal data or if you wish to exercise your rights, you can contact the Data Protection Officer (DPO) of "MEGAS IKE – "ADAMA MYKONOS"" using the following contact details:

- By email: at the email address info@adamamykonos.com
- By post: to the address of "MEGAS IKE "ADAMA MYKONOS"", Skalado, Mykonos, 84 600, Attn: Data Protection Officer.

In any case, you also have the right to lodge a complaint with the Greek supervisory authority "Hellenic Data Protection Authority" (<u>www.dpa.gr</u>).

We reserve the right to modify or update this Privacy Notice at any time. We will inform you of any changes by posting the updated Privacy Notice on our company's website and notifying you through any appropriate means. We also encourage you to regularly consult this Privacy Notice for any potential changes.

At your disposal.