



PRIVACY POLICY

The protection of your personal data is a priority for us. Find out more about how **GALAXIDI MARINE FARM S.A.** processes your personal data.

Definitions

In implementing this policy, it is necessary to explain the following terms:

“Personal data” means any information relating to an identifiable living natural person 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, economic, cultural or social identity of that natural person.

Data processing, in relation to information or data, means the collection, recording or retaining information or data, or performing any operation or set of operations on the information or personal data, including: (a) organisation, adaptation or modification of information or data; (b) retrieval, consultation or use of information or data; (c) disclosure of the information or data by transmission, dissemination or otherwise making available; (d) or alignment, combination, restriction, erasure or destruction of the information or data.

Principles governing the processing of personal data

We make sure we are fully compliant with the current data protection legal framework, including the General Data Protection Regulation (GDPR), and process personal data in accordance with the basic principles in force. As such, we ensure that personal data are:

a) processed lawfully, fairly and in a transparent manner in relation to the data subject;

b) collected for specific, explicit and legitimate purposes and not subjected to further processing in a manner that is incompatible with these purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes are not considered to be incompatible with the initial purposes.



c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

d) accurate and, where necessary, kept up to date;

e) kept in a form which permits identification of data subjects only for as long as necessary for the purposes for which the personal data are processed;

f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures;

g) not transferred to a country or territory outside the European Economic Area, unless such country or territory can ensure an adequate level of protection of the rights and freedoms of data subjects when processing personal data.



Individual Rights

Rights of Data Subjects	
Right to notification	The data subject has the right to be informed about the collection and use of his or her personal data.
Right of access	The data subject has the right to obtain from GALAXIDI MARINE FARM S.A. confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, to obtain access to the personal data that is in a concise, easy to understand, transparent and easily accessible format.
Right to rectification	The data subject may request and GALAXIDI MARINE FARM S.A. must ensure that it will undertake without undue delay to rectify inaccurate or incomplete personal data, including via a supplementary statement.
Right of erasure	The data subject has the right to ask GALAXIDI MARINE FARM S.A. to erase personal data that pertain to him or her without undue delay, and GALAXIDI MARINE FARM S.A. is obliged to erase those data, under conditions set by law.
Right to restriction of processing	The data subject has the right to ask GALAXIDI MARINE FARM S.A. to restrict its processing activities to only specific purposes as specified by law.



Right to object	The data subject has the right to object at any time and for whatever reasons related to his or her particular status to the processing of pertinent personal data. GALAXIDI MARINE FARM S.A. will no longer subject the personal data to processing, unless GALAXIDI MARINE FARM S.A. can demonstrate compelling and legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.
Right to data portability	The data subject has the right to receive the personal data concerning him or her, which he or she has provided to GALAXIDI MARINE FARM S.A. in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller without hindrance from GALAXIDI MARINE FARM S.A., to which the personal data have been provided.
Right to obtain human intervention	The data subject has the right not to be subject to decisions based solely on automated processing, including profiling, which produces legal effects concerning him or her or has a similar effect.



GALAXIDI MARINE FARM S.A. fully respects the aforementioned rights and will assist data subjects in exercising them.

Accountability and governance

In accordance with the principle of accountability, GALAXIDI MARINE FARM S.A. has adopted policies and measures to achieve compliance with all current data protection requirements and to ensure that compliance can be adequately demonstrated. To that end, GALAXIDI MARINE FARM S.A.:

- Takes appropriate technical and organisational measures to ensure and demonstrate compliance;
- Has adopted and applies a Data Protection Framework, including this Privacy Policy, procedures for handling data subject requests and any actual or potential data infringements, the Information Security Policy, personnel training, internal audits of processing activities and the regular review of internal policies and procedures that include personal data processing;
- Maintains relevant documentation relating to processing activities in an organised and continually updated record of processing activities;
- Implements measures and policies which meet the principles of data protection by design and by default;
- Ensures minimisation of the data and, where appropriate, implements measures such as pseudonymising or encryption and continually improves security features;
- Conducts a data protection impact assessment, where appropriate.

Contracts

Any third party acting as data processor to process personal data must enter into a written contract with GALAXIDI MARINE FARM S.A. When acting as data controller of personal data, GALAXIDI MARINE FARM S.A. is responsible for its compliance with the current legal framework for personal data protection and must use only data processors who can provide sufficient guarantees that the requirements of the current legal framework will be met and that the rights of data subjects will be protected.



Data protection by design and by default

Any activity of GALAXIDI MARINE FARM S.A. which involves processing of personal data is done with the protection of data and privacy in mind at every step. That includes internal measures, product development, software development, IT systems and much more. Further, as soon as a product or service is developed, the strictest confidentiality regulations must apply by default.

NOTICE OF CUSTOMER DATA PROTECTION

1. Which of your data we process

GALAXIDI MARINE FARM S.A. (hereinafter the “Company” or “We”), upon receiving offers as part of evaluating your potential cooperation with the Company or performance of an existing trade agreement, collects and retains the following data:

- Company name
- Contact information (address, telephone, mobile, fax, e-mail)
- Contact person information
- Tax ID No., competent tax office, occupation
- Bank information (IBAN, beneficiary)
- Company’s financial data, company’s position in the market

2. Why we process your data

We process your data as part of reviewing a potential cooperation with you (evaluating offers) or for the purpose of executing contracts between us, if you are an existing customer of the Company. Specifically, we process your data exclusively for the following purposes:



2.1. Contractual obligations

As part of our commercial transaction, we collect, process and store the data you provide us and which are necessary for concluding and executing related contracts. Specifically, we use your data to create a customer record as part of keeping the Company's customer register, entering and filling your orders, handling returns of goods, and for managing and collecting your overdue payments to the Company.

2.2. Improving product & customer service quality

We use your contact information to conduct satisfaction surveys with our Company's customers and to check the quality of our products. Specifically, we send you special questionnaires to fill out so we can process the responses and extract statistical data. In all cases, your anonymity is secured, unless you voluntarily elect to add the details of your company on the relevant questionnaire. For the same purpose, we process the data you give us as part of our customer service and complaint/request handling.

2.3 Internal information and communication procedures

We use your data as part of our internal procedures when submitting Company reports related to monitoring sales and developing our network.

2.4 Customer information

As part of our commercial cooperation, we use the data you have given us to inform you about our new price lists or to send you informational material about our Company. When our cooperation has been concluded, you will no longer receive informational material from the Company, unless you provide consent to do so.

2.5 Legal Obligations & Claims

If we are legally obliged to so, we will provide your data to the competent authorities. We will retain and process your data to the extent required to establish, exercise or defend legal claims.



NOTICE OF SUPPLIER DATA PROTECTION

1. Which of your data we process

GALAXIDI MARINE FARM S.A. (hereinafter the “Company” or “We”), upon receiving offers as part of evaluating your potential cooperation with the Company or at a later stage when executing an already existing commercial contract, collects and retains the following data:

- Company name
- Contact information (address, telephone, mobile, fax, e-mail)
- Contact person information
- Tax ID No., competent tax office, occupation
- Bank information (IBAN, beneficiary)

2. Why we process your data

We process your data as part of reviewing a potential cooperation with you (evaluating offers) or for the purpose of executing contracts between us, if you are an existing supplier of GALAXIDI MARINE FARM S.A. Specifically, we process your data exclusively for the following purposes:

2.1. Contractual obligations

As part of our commercial transaction, we collect, process and store the data you provide us and which are necessary for concluding and executing the commercial agreements concluded between us. Specifically, we use your data to create a supplier record as part of keeping the Company's supplier register, and to monitor and manage agreements for outstanding balance.

2.2 Legal Obligations & Claims

If we are legally obliged to so, we will provide your data to the competent authorities. We will retain and process your data to the extent required to establish, exercise or defend legal claims.



3. Who receives and processes your data

Access to your data is only available to our duly authorised employees or external associates acting on our behalf to provide IT and technical support and/or conduct audits of the Company as part of our legal obligations arising from legislation in force.

4. How long we retain your data

We shall retain your data for 10 years from the time your agreement with the Company lapses, and they shall then be deleted. In the event a possible cooperation with us does not proceed, we shall retain your data for 2 years from our last communication.

5. Your rights

Our Company safeguards your rights in relation to protecting your personal data and takes steps to assist you in exercising them. You have the right to request:

- access to your personal data and information on which of your data we process, the purpose of processing, the recipients of the data and the duration of processing;
- the rectification of your personal data if they are inaccurate or incomplete;
- erasure of your personal data or their transfer to a third party, if the conditions established by the national and European legislative framework for exercising these rights are met;
- restriction of processing of your personal data to specific purposes only;
- the portability of your data, meaning you will receive the data you have provided in a structured, commonly used format or to ask that they be sent to a third party you designate.



If you wish to submit a request or exercise one of your rights regarding your personal data, you can contact us at:

GALAXIDI MARINE FARM S.A.
ANEMOKAMPI
GR-33200, GALAXIDI
e-mail: dataprotection@galaxidimarine.farm

Finally, if you believe your rights are being violated, you have the right to lodge a complaint with the Data Protection Authority (www.dpa.gr)