**CONTROLLED**

**CLASSIFICATION:**

# DOCUMENT APPROVAL DETAILS

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| --- | --- | --- | --- | --- |
|  | **FULL NAME** | **POSITION/TITLE** | **DATE** | **SIGNATURE** |
| **PREPARED BY**  **CONTROLLED/APPROVED** | ALPHA PLAN CONSULTANTS | EXTERNAL ADVISOR | 01/7/2020 |  |
|  |  | 01/7/2020 |  |
| CHRISTOS VOGIANNOU | MANAGEMENT | 01/7/2020 |  |

1. **PURPOSE**

This cookies policy explains what cookies are and how the company uses them on its website. By reading this policy, you will be able to comprehend:

* the types of cookies we use each time you visit our website;
* the information we collect by using these cookies; and
* how this information is used.

# CONSENT

By using the company’s website, you agree to the terms of this policy. Every time you submit information via this website, you grant your consent to such information being collected, used and communicated as set out in this Policy and to any privacy protection statements applicable to the country or website.

In order for cookies to be used, your prior consent is required, with the exception of technical cookies, which are responsible for the correct functioning of a website and for a user to browse it.

# DEFINITION OF COOKIES

Cookies are small pieces of text stored on your hard drive by a website’s server, on the basis of our legitimate interest to optimise our website. Cookies allow a website to:

“remember” your actions during your browsing session. Cookies do not cause damage to your device, do not contain viruses, trojans or other malicious software. A web browser is part of your computer and stores specific preference information, e.g. preferred language, location, and so forth.

Cookies can perform many functions and are mainly used to measure the traffic of a website as a whole or of only specific subpages. Indicatively, they can track the number of visitors live or per hour of the day, their geographical origin, their operating system and the resolution of their computer monitor, the page from which they came (through a search engine, a link from another page or direct entry), the keyword used in the search engine, etc. Other cookies can remember, for the user’s benefit, the language selected or their search results on a website. Others may record the failed attempts of a user to enter a website, in order for them (the websites) to require, after a certain number of failed entry attempts, further cross-referencing of visitors’ personal data, e.g. by entering an additional code sent by SMS to their mobile telephone.

Furthermore, when you visit a website in order to browse it or read information, certain “visitor information” that concerns you is collected and stored, such as the name of the domain and the provider through which you access the Internet, your computer’s IP address and the addresses you visited. This information is used both to measure traffic and to collect the information necessary to improve the usability of webpages.

If you do not wish to receive ‘cookies’, you can configure your browser so as to block ‘cookies’ or notify you when a ‘cookie’ is installed on your computer.

While you are not obligated to accept ‘cookies’ when you visit the Company’s website, you may be unable to use all the functions of our website, and certain pages of the online platform may not be displayed correctly if your browser blocks our ‘cookies’.

# Information collected and how it is used

When you access and use the Company’s website, the ways in which we may collect information and personal data that concern you are the following:

# Information collected by installing a ‘cookie’ on your computer

The Company website uses the following types of cookies, as indicated below in detail:

# Google Analytics

The Company website uses Google Analytics as a Google tool that helps it understand how website users use its functions. Google Analytics is used to extract website traffic statistics. Cookies are used to collect information and statistics concerning the use of the website, but without collect personal information that could identify each visitor. The main cookie used by Google Analytics is the “\_ga” cookie.

The cookies used by the Google Analytics services are listed below in detail

|  |  |  |
| --- | --- | --- |
| **Name Duration Description** | | |
| **\_ga** | 2 years | Logs a unique identifier used to create statistical data on how a visitor uses the website. |
| **\_gid** | 24 hours | Logs a unique identifier used to create statistical data on how a visitor uses the website. |

# Essential cookies (PHPSESSID)

These are cookies that are essential in order for users to browse the website or be provided with specific capabilities they requested. This cookie is used by applications based on the PHP language. This general-purpose identifier is used to maintain variables during the user’s session. This cookie expires when the browser is deactivated.

# Google Advertising

We use cookies from the Google Advertising service to draw conclusions for advertising purposes. Some common cookie apps are choosing the content-based ad for a user, improving reporting on the performance of a campaign run by our company, and avoiding showing ads that have already been shown to a user.

As a user browses the site, Google Analytics provides JavaScript tags (libraries) that are relevant to our company for recording information about the website visited by the user, such as the URL of the webpage. Google Analytics JavaScript libraries use HTTP cookies to “remember” what actions a user took on previous pages/interactions with the website.

Advertisement cookies help to display ads to users that are relevant to their interests so that they do not receive unwanted messages. The cookies used by our Company provide information about how end-users use the website and any ad that end users may have seen before visiting our company’s website. Some of the main ad cookies we use are called “IDE” and “NID” and are stored in browsers in the doubleclick.net domain (which is owned by Google). These cookies help us understand your interests and show you relevant ads.

Another cookie we use is the CONSENT cookie, which helps log your preferences.

More information can be found at: https://policies.google.com/technologies/types?hl=el

The cookies used by the Google Advertising service are listed below in detail:

|  |  |
| --- | --- |
| **S/N** | **Name** |
| **1.** | PREF |
| **2.** | VISITOR\_INFO1\_LIVE |
| **3.** | CONSENT |

1. **Marketing Cookies - hjid**

This cookie is set when a user first lands on a page that contains a Hotjar script. It is used to store the random identifier of the user that is unique on this website in the browser. This ensures that behaviour on subsequent visits to our website is attributed to the same user.

# Information you provide voluntarily

The Company website collects information you willingly and voluntarily provide in order to benefit from a capability of or participate in an activity on the Company website. For example, the Company website may collect your information in order to send you e-mail messages when you request information on the provision of services or submit a request to us or send us an e-mail message. In many cases, this information may include the collection of personal data.

Our Company uses your personal data solely for the reasons for which you provided them. For example, if you provide your e-mail address stating that you wish to receive notifications, we shall use your e-mail address to send you the e-mail notices and notifications you request.

We may also use the information we collect on our Company website for various purposes, such as providing customer services, preventing fraud and improving our services. We may also remove all information constituting personal data and use the remaining information for historical, statistical or scientific reasons.

You can control and/or delete cookies to suit your preferences. Further details can be found at the following website: [www.aboutcookies.org.](http://www.aboutcookies.org/) You can delete all the cookies already stored on your computer and configure most browsers so that they do not allow cookies to be installed. However, in this case you may need to personally adjust certain preferences each time you visit a website, as certain capabilities of our website may not be able to function normally.

# MANDATORY NATURE OF CONSENT TO THE STORAGE OF COOKIES

The installation and use of “cookies” is specifically regulated under Article 4(5) of Law 3471/2006 (which transposed Directive 2002/58/EC into Greek Law) and decision Ref. No Γ/ΕΞ/1525 (Athens, 25/2/2020) of the Hellenic Data Protection Authority, whereby the installation and use of “cookies” is allowed only upon consent of the user. A website may install such “cookies” only if users have given their consent, after they have received clear and extensive information about the installation, the purpose of processing, the exercise of the right of access and any recipients of the data, irrespective of whether personal data are ultimately processed through said website.

This consent may be given through appropriate settings in the web browser or other application.

# Obtaining the visitor’s consent

Given that Google Universal Analytics cookies are third-party cookies in terms of our website and are not included in the exemptions set out in decision Ref. No Γ/ΕΞ/1525 (Athens, 25/2/2020) of the Hellenic Data Protection Authority, our website obtains the consent of visitors before storing cookies on their terminal equipment. Users can delete the cookies stored by this website in their browser at any time through their settings.

More specifically, the website uses a special plug-in, which prevents cookies from being stored on visitors’ terminal equipment unless their consent is first obtained by clicking on the ‘accept’ button. There is a link near the ‘accept’ button leading to this cookies policy of the website, where users can read all the necessary information that will help them decide whether or not to consent to accepting cookies.

# DISCLOSURE OF PERSONAL DATA

The Company shall not sell the personal data collected from its websites to mailing list brokers without your express consent.

The Company may share the personal data collected to its other Departments or operational units. When this occurs, the stakeholders shall use your data in a manner that is consistent with the purpose for which they were initially collected (or to which you subsequently consented).

The Company may also share your personal data with third parties providing support services. These third parties must use the data we share with them solely in order to perform services on our behalf and to process them as strictly confidential, in compliance with all applicable privacy and personal data protection laws.

# PERSONAL DATA SECURITY

Personal data collected shall be stored in our Company databases or databases kept by our service providers.

The Company takes reasonable measures to protect the security, confidentiality and integrity of your personal data. While we use security measures to help protect your personal data from unauthorised disclosure, misuse or alteration, please be aware that no transmission over the Internet is absolutely secure or error-free.

The Company shall not be held liable for security breaches beyond its reasonable control.

# ACCESS TO PERSONAL DATA

You may revise, rectify, update and request the erasure of your personal data collected via the Company website by e-mailing us at [info@greekathome.gr](mailto:info@greekathome.gr).

# CHOICES

The Company does not require users to submit personal data online, but may require users to provide certain personal data in order to obtain additional information about the services provided.

The Company may also ask customers for permission for certain uses of their personal data and they can either consent to or deny those uses. If customers wish for specific services or communications, such as a presentation of the Company’s services, they can be removed from the relevant list of recipients at any time following the instructions contained in each communication. If they decide to unsubscribe from a service or contact, the Company shall attempt to delete their data as soon as possible, although it may take some time and/or information before this request can be processed.

# PERSONAL DATA RETENTION

The retention period of your personal data will vary depending on the purpose and use of the data collected. Where legal requirements apply, we shall retain certain types of data for specified periods. Otherwise, we shall retain the data for no longer than necessary for the purposes for which the data was collected.

# CHILDREN AND PARENTS

Most of the Company’s websites are not intended for children under the age of 15. The Company does not intentionally solicit or collect personal data from or about children on its websites unless permitted by the legislation in force.

# 111. CHANGES TO THIS POLICY

The company frequently reviews this Policy and may amend or revise it periodically at its discretion. When changes occur, the date of the amendment or revision to the Policy shall be recorded.

The Company encourages users to periodically consult this Policy in order to examine whether the way the Company processes your personal data has changed. This Statement was last updated in July 2020.