

Privacy Policy

Latest update: May 25th, 2018

Thank you for using our products and services (hereinafter the “**Services**”). Our Services are provided by the company with the trade name “Societe Anonyme for the Management & Operation of Networks for Electronic Transactions Cardlink” and the distinctive title “CARDLINK S.A.”, having its registered seat at Irakleio of Attica, 41-45 Marinou Antipa Str., with Tax Registration Number 999265069, Tax Offices FAE of Athens (hereinafter “**Cardlink**”).

The present Privacy Policy aims at explaining to you which data we collect through our Services and websites and how we use them and to inform you of your rights (hereinafter “**Policy**”).

1 Information we collect

Upon provision of our Services, Cardlink may collect data, such as name and/or corporate name, address, telephone number, Tax Registration Number, e-mail address, comments and observations, payments data for payment instruments (as indicatively card numbers), transactions data or other information, under the condition that they were requested and voluntarily submitted by you per Service or through particular functionalities provided in our facilities or through our websites. Cardlink may also collect the above data from third-party contractors or the cooperating banks, provided that they were lawfully collected pursuant to an agreement or existing relationship between you and such third party and under the condition that you were duly informed that your data may or will be transferred and/or notified to third parties, such as our company.

2 Purposes of processing

Cardlink processes and uses your personal data collected by Cardlink and/or provided to Cardlink from you for one or more of the following legitimate purposes:

- For providing the services that you wish Cardlink to provide you, for duly performing its agreements with third parties, such as the banks, relating to any products, services and/or transactions you request, for complying with our contractual obligations, for proving and managing your orders, for after-sales assistance, repair and maintenance purposes, in order to communicate with you with respect to your submitted orders, as well as when this is reasonably necessary or required for compliance with legal or regulatory requirements, for resolution of disputes, for the prevention of fraud and abuse or the imposition of terms and conditions, for registering you to our website and providing you with our Services (i.e. processing of queries to our company and/or our Services); for the assessment and analysis of the market and Services provided by Cardlink (i.e. submitting questions in order to receive your personal opinion re our Services, conducting customer surveys); for tracking, reviewing and improving our Services; for the creation and development of a centralized system of reporting and for the statistical analysis of your transactions; for retention of records;

- For preserving and safeguarding our legal interests, as well as your legal interests. To that end, we use closed circuit TV (CCTV) and security cameras in order to be in a position to protect the safety of natural persons, property and facilities. We also use special security software for detecting and preventing malicious actions. In particular, during your visit at our websites, we use information, such as your IP address, location information, the type of your device, in order to detect and/or prevent frauds or abuses of our website;
- In order to comply with a legal obligation, such as regulatory obligations relating to tax legislation or payment systems.

We do not collect nor retain personal data beyond the minimum which is necessary for the above purposes or personal data which are not relevant to such purposes of processing.

3 Period of retention of personal data

Cardlink retains personal data collected for the above purposes for the time period necessary for each particular case. In more specific, data retention period is decided on the basis of the following specific criteria as the case may be:

- When processing is made on the basis of a contract, your personal data shall be stored for as long as necessary for the performance of the contract and for the establishment, exercise or defense of legal claims arising out of such contract;
- We will retain your Cardlink electronic account information for as long as the account remains active and de-activation and/or deletion has not been requested;
- Personal data that you have voluntarily provided to Cardlink for the provision of our Services, will be stored and retained for the time period required in order to be able to continue the provision of such Services;
- When this is reasonably necessary or required for the compliance with legal or regulatory requirements, for the resolution of disputes, for the prevention of fraud and abuse or for the imposition of terms and conditions, we may retain particular information as the case may be, even upon the expiry of your account or even if it is not required for the provision of our Services;
- When processing is imposed as a requirement under provisions of the applicable legal framework, your personal data shall be stored for as long as required by the relevant provisions.

4 Transfer of personal data to third parties

Cardlink allows access to your personal data to members of its personnel (to the extent that this is necessary for the performance of their duties) and to companies providing systems and operations and/or services that are essential to Cardlink in order to provide its Services to you and to other customers, such as the cooperating banks. Such companies provide Cardlink with systems for the processing of transactions, call centers for customer service, software development services relating to our Services, services for the installation and management of POS terminals, marketing services as well as other ancillary services that may include customersupplier management systems, courier and cloud services.

If you are a holder of a Cardlink electronic account, we may transfer your personal data, for the purposes notified to you on a Service-specific basis and described in the present Policy and to the extent that such notification and/or transfer is necessary, to companies that provide us with online services and applications, which are interconnected with our Services, for the exclusive purpose of providing you with a better customer service, responding to your queries and improving your experience when using your Cardlink electronic account.

Please also be informed that we might transfer your data within and outside the EU in order to provide our Services in the most efficient way and for the purposes notified on a Service-specific basis and described in the present Policy, in cases where third parties that provide Cardlink with systems and operation services have their establishment or provide their services to Cardlink from third countries. Under any circumstances, we undertake to comply with our legal obligations with respect to the protection of personal data; we will examine and assess the level of compliance of our sub-contractors pursuant to the requirements of the applicable legislation on the protection of personal data; and we will enter into written agreements in order to ensure that the level of protection is the same or higher than the level accorded by EU legislation on the protection of personal data.

You may exercise your right of objection pursuant to par. 11 of the present Policy so that any processing and transferring actions made with respect to your data and according to the terms of the present Policy not to be further executed; in such case, however, you may no longer be in a position to use Cardlink Services.

5 Information Security

Cardlink takes all necessary measures, either organizational or technical, in order to safeguard the security of the Services provided, as well as the confidentiality of the data and information stored in its Services.

Access to Cardlink Services is provided at your own initiative, not at the initiative of Cardlink. You are responsible for acquiring and maintaining necessary equipment (i.e., personal computer), software, telecommunication equipment and other services potentially required for gaining access to Cardlink Services, websites and platforms.

You undertake to safeguard and to protect your computer and systems from viruses and other malicious software.

Cardlink has taken, to the extent that this is possible, all necessary security measures so as to protect its websites from viruses and other malicious software. Cardlink controls access to its website using security systems in order to prevent attacks and other unauthorized actions. However, Cardlink cannot guarantee that the content of the website through which it provides its Services is free from viruses, errors and other damaging data and is not responsible for any damage caused to you, to your software, documents or files, or for any damage in general that you might suffer due to the above.

6 Use of cookies

Our website uses cookies in order to enable your access to our Services. The main purpose of the use of cookies is to save your preferences and other information to your personal computer in order to save time, since you will not need to re-submit same or identical information each time you use our website, as well as in order to personalize your experience and to customize content and to display advertisements that may be of interest to you upon visiting our website.

You may accept or reject use of cookies; please note that this might affect accessibility and use of Cardlink Services. Should you wish to disable cookies, you may do so by changing your web browser setting(s). Please note that disabling cookies may prevent you from logging-in, accessing or assessing certain interactive parts of our website and/or services that require cookies.

We will ask you to provide us with your consent in order to use cookies, i.e. Google Analytics cookies. Further information on how Google processes your personal data through Google Analytics can be found in the web link below: <https://policies.google.com/privacy/update#infocollect>.

7 Third Party websites

Our website may contain links to other websites operated by external third parties, while websites operated by external third parties may contain links to our website. Despite the fact that we aim at ensuring that our website is only linked to external websites that maintain and enforce the same privacy and personal data protection standards, we are not responsible for the privacy and/or personal data protection practices of such third party websites insofar as you have left our website. Cardlink suggests that you are careful and review applicable terms and privacy and/or personal data protection policies of such websites.

8 Transfer of personal data to debtor informing companies for non-performing obligations

In case you have entered into an agreement with Cardlink relating to any of its Services for the provision of which you have undertaken the obligation to pay a respective fee and your corresponding debt to Cardlink becomes overdue and fails to be settled, we do hereby inform you that your personal data (contact details and other information on your debt) will be notified and transferred to a debtor informing company for non-performing obligations so that such company proceeds to informing you respectively on the status of your debt pursuant to the provisions of L. 3758/2009, as amended and in force. In case your personal data are inaccurate, you should immediately inform Cardlink to the contact details referred to in paragraph 11 of the present Policy.

9 Voice recordings

We would like to inform you that in order to manage your requests in the most efficient way for the performance of our contractual relationship, phone conversations between you and an

authorized representative of Cardlink are recorded. Such recordings are stored for an appropriate period of time, as such period is determined according to applicable legislation and relevant decisions of the Greek Data Protection Authority. It should be specified that not all phone calls are recorded, i.e. phone calls initiated from our offices are not recorded.

10 Rights of data subjects

Right of information and access: You have the right to access your personal data and to receive information with respect to the processing thereof. You may exercise the right to be informed, as well as the right to access your personal data by sending an e-mail to dataprotection@cardlink.gr with subject line “Personal Data”.

Right of rectification: You have the right to request the correction, modification, completion and update of your personal data processed. You may exercise the right to rectification of inaccurate personal data by sending an e-mail to the e-mail address: dataprotection@cardlink.gr, with subject line “Personal Data – Rectification”.

Right of erasure: You have the right to obtain from Cardlink the erasure of your personal data, in cases when such data are processed on the basis of your consent or in order to safeguard the legitimate interests pursued by Cardlink. In all other cases (i.e., when there is a contract in force, when personal data are processed for compliance with a legal obligation or for reasons of public interest), the above right of erasure is subject to specific limitations or is not applicable at all depending on the particular case. You may exercise your right of erasure by sending an e-mail to the e-mail address: dataprotection@cardlink.gr, with subject line “Personal Data – Erasure”. Please specify in your request the actions to which you wish us to proceed and the purpose thereof, since in case, for example, you wish to stop being contacted for advertising and promotional purposes, the appropriate action would possibly be the restriction of the processing of your personal data rather than their erasure.

Right of restriction of processing: You have the right to obtain from Cardlink restriction of processing when one of the following applies: (a) the accuracy of the personal data is contested, for a period enabling the verification of the accuracy of the personal data; (b) the processing is unlawful and you oppose the erasure of your personal data and request the restriction of their use instead; (c) personal data are no longer needed for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; and (d) you have objected to processing pending the verification whether the legitimate grounds of Cardlink override those of you as the data subject. You may exercise your right of restriction of processing by sending an e-mail to the e-mail address: dataprotection@cardlink.gr, with subject line “Personal Data – Restriction of Processing”.

Right of objection to processing: You have the right to object at any time to processing of your personal data, when processing is necessary for the purposes of the legitimate interests pursued by the controller or in case personal data are processed for direct marketing purposes and profiling. You may exercise your right of objection by sending an e-mail to the e-mail address: dataprotection@cardlink.gr, with subject line “Personal Data – Objection/Optout”.

Right to data portability: You have the right to receive your personal data in a structured, commonly used and machine-readable format, as well as the right to transmit those data to another controller. Such right to data portability applies to personal data that you have directly provided to Cardlink and the processing thereof is carried out by automated means based on your consent or on a contract. You may exercise your right to data portability, by sending an email to the e-mail address: dataprotection@cardlink.gr, with subject line “Personal Data – Portability”.

Right to withdraw your consent: You have the right to withdraw your consent at any time, to the extent that such consent had been received for the purpose of processing. You may exercise your right to withdraw your consent by sending an e-mail to the e-mail address: dataprotection@cardlink.gr with subject line “Personal Data – Withdrawal of Consent”.

In case you wish to directly contact the Data Protection Officer (Cardlink DPO), you may address Mrs. Aggloupa Eleni by calling the telephone number: +30 211 106 9711 or by sending an e-mail to dpo@cardlink.gr , with subject line “Attn: DPO”.

11 Right to lodge a complaint before the Greek Data Protection Authority

The person of which the data is processed by Cardlink has the right to lodge a complaint to Greek Data Protection Authority (www.dpa.gr), Tel: +30 210 647 5600, Fax: +30 210 647 5628, E-mail address: complaints@dpa.gr.