

The company act4HR has fully complied with and adheres to all organizational and technical measures for the protection of personal data, following the GDPR.

1. Introduction

At act4HR, we emphasize the importance of privacy and commit to adopting principles for the protection of personal data. This Privacy Policy describes how we collect, store, and process your personal data when you communicate with us or use our services. The purpose of this Privacy Policy is to inform every individual about the type and extent of Personal Data (PD) we collect, the purpose for which we collect it, the legal framework allowing its processing, as well as their rights and how to exercise them. The Privacy Policy outlines the procedures you (as an individual) should follow if you have any questions or requests regarding your personal information, our policies, and procedures, or if you want to update, manage, or delete your personal information. Additionally, the Privacy Policy documents our compliance with legislation, specifically with EU Regulation 679/2016 and Law 4624/2019 for the protection of Personal Data (PD), demonstrating our respect for privacy and PD security. The Privacy Policy applies to PD provided by individuals and PD we collect (as Data Controllers) in the course of our activities. This Privacy Policy is posted on the corporate website and is addressed to every individual who has or intends to have any kind of relationship with us.

2. Who We Are

Act4HR was founded in 2023 and is engaged in providing specialized services for human resources. Our goal is to improve processes related to human resources and empower each member to contribute to its effective utilization and increased efficiency.

3. Personal Data Processing

Personal Data (PD) refers to any information or element through which the identity of a specific natural person can be directly or indirectly verified. We, as a necessity, process (i.e., collect, manage, store, delete) PD in the course of our operational functions and often in compliance with legislation and regulations. You (as natural persons) are not obligated to provide the PD that may be requested, but in case of refusal, we may not be able to provide you with specific services or respond to your requests with the same speed and quality.

We only process absolutely necessary Personal Data (PD), which is appropriate, relevant, and essential for the purpose for which it is being processed. When a natural person communicates with us, visits us, or uses our website or services, additional relevant personal information may be requested for identification or further collaboration. Specifically, we process PD in the following cases:

User Registration on the Corporate Website

- Username
- Email address
- Contact phone
- Contact address
- Photo/registration via another account, e.g., Google

Visit to Our Website

When a natural person visits and interacts with our corporate website, certain information may be automatically collected, such as:

- Internet Protocol (IP) address of the computer
- Type of browser
- Originating website
- Date and duration of the visit
- Operating system

The goal is to calculate website visitors, communication effectiveness, etc. The company does not manage or process geolocation data. We do not seek to collect PD for children under 13 years of age; therefore, you must be over 18 years old to use our website and services.

4. Purpose of Personal Data Processing

We process (collect, store, share, delete) Personal Data (PD) for specific purposes only. Additionally, we process the PD of natural persons only when there is a legal basis for their processing, aiming to provide you with better service, particularly:

- To provide the services mentioned on our website.
- To offer personalized services.
- To communicate with you and inform you about new services that may interest you.
- To process your payment or prevent/detect possible fraud.
- To respond to complaints or requests you have submitted.
- To seek your opinion (which may be posted on the corporate website).
- To develop and improve services, study trends, enhance communication methods, and the functionality of our websites.
- To satisfy relevant legal and regulatory requirements and obligations.

5. How We Collect Personal Data

We may collect PD (Personal Data) from various sources. This may include:

- PD you send or provide to us (e.g., during your communication with us).
- PD we collect automatically (e.g., during your website visit or your registration for newsletters or blogs).
- PD we collect from other sources (such as chambers of commerce or publicly available databases).
- You have requested information or updates.

- You have attended or expressed interest in our events, training sessions, or information.
- You have subscribed to our newsletter or blog.
- You have expressed interest in collaborating with us.

We may also receive personal information indirectly in the following cases:

- We have collected personal information as part of market research/satisfaction surveys.
- From our partners or collaborating organizations.
- We may obtain information from advertising networks, our clients, or third parties to inform you about service packages and training that may interest you.
- Your personal information is publicly available. When you communicate with us, we keep a record of our communication messages to resolve any issues that may arise. We do not allow unauthorized entities, especially without your consent, to access your personal information.

6. With Whom We Share Personal Data (PD)

We do not disclose or share PD with other companies, organizations, or individuals for the purposes of direct or indirect advertising and communication. We disclose or share PD with third parties in the following cases:

- **With Your Consent:** We share PD with companies, organizations, and individuals when we have your consent.
- **In the Context of a Contractual Relationship:** We disclose PD in the context of fulfilling a request or contract or to take pre-contractual measures at the request of the individual (e.g., availability of PD for someone interested in training or coaching).
- **For External Processing:** We provide PD to our external partners and businesses or individuals we trust to process it for our own use (e.g., accounting or IT support) and in accordance with our Privacy Policy and appropriate confidentiality and security measures, as stipulated by EU Regulation 679/2016 and relevant national legislation.
- **For Legal Purposes:** We share PD with competent public authorities when reasonably necessary and for compliance with laws, regulations, etc.
- **In the Context of Scientific Research:** We may provide anonymized PD for scientific or statistical studies.
- **For the Purposes of Legitimate Interests We Pursue:** We share PD with our partners, taking all appropriate measures to protect and secure the data.

7. Duration of Personal Data Retention

We retain the personal data (PD) of individuals only for as long as necessary, depending on the purpose of their processing and in accordance with this Privacy Policy.

For example, we may need PD to address complaints or inquiries about our services, and therefore we may retain them for a reasonable period after the completion of the collaboration (e.g., the period within which potential claims may arise or the time necessary to evaluate and respond to questions or complaints). Additionally, the storage of PD is required for tax/accounting purposes, with the retention period defined by legislation related to tax authorities or financial investigation units. Once PD is no longer needed, it is deleted or destroyed.

Furthermore, the duration of PD retention depends on the legal basis of the processing:

- **In cases where the legal basis is the pursuit of legitimate interests**, the processing of personal data will occur for as long as deemed necessary for the purposes of the legitimate interests we pursue as the Data Controller, as well as for as long as required until the expiration of the statute of limitations for any related claims.
- **In cases where personal data is provided consensually by the data subjects** (e.g., when subscribing to newsletters, blogs, or offers), the PD will be retained (both in print and electronic format) for as long as there is a contractual relationship with the individual or as long as required by relevant legislation, or until the given consent is withdrawn.
- **When you (the data subject) withdraw your consent** for the processing of your personal data, and there is no legal basis to continue the processing, we will destroy/delete your personal data. However, when you unsubscribe (e.g., from marketing communications or the website), we will retain your email address to ensure that no future correspondence is sent.
- **In cases where the legal basis for processing is the fulfillment of a request/contract** or to take pre-contractual measures at the request of the individual before entering into a contract, the PD will be retained for as long as the contractual relationship is maintained or as long as required by relevant legislation, or until the expiration of the statute of limitations for any related claims.

8. Rights of Data Subjects

In accordance with personal data protection legislation, as a natural person (customer/employee/visitor/partner), you have specific rights, and it is our obligation to inform you about them. The exercise of these rights depends on the purpose of processing personal data (PD), ensuring compliance with relevant legislation.

Specifically, your rights include:

1. **Right to Information:** You have the right to request and receive clear and understandable information about how your personal data is used and about your rights. This Privacy Policy serves as a source of relevant information.
2. **Right of Access & Correction:** You can access, correct, or update your personal data at any time.
3. **Right to Portability:** You have the right to receive the PD you provided in a structured, readable, and interoperable format and transmit it to another organization. This right is

applicable when your personal data is provided based on your consent or in the context of executing a contract.

4. **Right to Erasure of PD:** You can request the deletion of your personal data in certain cases. However, the exercise of this right is subject to conditions specified by relevant legislation (e.g., you cannot request the erasure of PD when labor law or tax authorities require retention for 10 years).
5. **Right to Restrict Processing of PD:** You can request the limitation of the processing of your PD in certain circumstances, including situations involving direct marketing.
6. **Right to Lodge a Complaint with the Independent Authority for PD Protection:** <http://www.dpa.gr> or any national Data Protection Authority. This allows you to address concerns about how we process your personal data.
7. **Right to Withdraw Consent:** If you have provided consent for the processing of PD, you can withdraw it at any time. The withdrawal does not affect the lawfulness of processing based on valid consent until the date of withdrawal. To withdraw your consent, contact us using the details specified in section §12 "Contact."

To exercise your rights:

Contact us via email at info@act4HR.gr, request a Subject Access Request (SAR) form, fill it out correctly, and submit it. We are obligated to respond to your request within one month of receiving the SAR form.

For additional information and guidance on your rights, refer to the Hellenic Data Protection Authority: <http://www.dpa.gr>.

9. Our Obligations

Among our obligations is the principle of accountability concerning the principles governing the processing of Personal Data (PD), including legality, objectivity and transparency, limitation of the purpose of processing, minimization of PD, accuracy of PD, limitation of storage period, security, integrity, and confidentiality. We process PD only when one of the following legal bases applies:

- **Your Consent:** For instance, when you have given your consent to receive newsletters or marketing emails from us, or when you have created an account on our website or subscribed to our blog or newsletter. You can withdraw your consent at any time by contacting us as specified in § 12.
- **Execution of a Contract:** When you contact us to express interest in a service, request additional information, schedule a meeting with our executives, or when you have purchased a service from us, we may need to use your contact and payment information to process your order and implement our service or to conduct customer satisfaction surveys.
- **Compliance with Legislation:** In certain cases, we may have a legal obligation to process/retain PD (e.g., compliance with labor/tax laws or financial research units).
- **Pursuit of Legitimate Interests:** If processing PD is necessary for our legitimate interests, unless overridden by the fundamental rights and freedoms of the data subject. This occurs when it is

necessary, for example, to understand our customer's needs, promote our services, or efficiently operate our websites and applications. Examples include processing PD of existing customers, receiving requests for consultancy, using resumes for onboarding processes and job descriptions, participating in coaching/training, etc.

10. Information about Cookies

Act4HR has the ability to use Cookies as part of facilitating and operating services provided through the website. Cookies are small files sent and stored on the user's computer, allowing websites like this one to function smoothly, collect multiple user choices, recognize frequent users, facilitate their access, and gather data to improve their content. Cookies do not cause harm to users' computers and the files stored on them.

Act4HR uses this information for identification and self-improvement purposes, to evaluate and improve its services, develop new features, conduct checks to address any issues, and improve its systems. By selecting "Accept," the website visitor provides their consent for the use of cookies.

11. Links to Other Websites & Transfers to Another Country

Our website may contain links to other websites or social media. We do not control any third-party websites, and therefore, we cannot be held responsible for the content of any linked website or any link contained in such a website. When we provide links to other organizations' websites, it is for your convenience, and you should carefully examine the privacy policy applicable to that website.

12. Contact

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