

PERSONAL DATA PROTECTION POLICY

The protection of natural persons against personal data processing is of the utmost importance for MYTILINEOS S.A. (hereinafter the "**Company**"). Therefore, the collection and processing of personal data by the Company is carried out only in accordance with the General Regulation and the applicable legislation in general, and whenever this is necessary in relation to the operation of the Company's industrial relations and business activities. The Company allows access only to authorized persons and it takes increased data security measures, inter alia, against loss, mishandling, unauthorized access, alteration or disclosure.

1. Personal data processing in the myprotergia application

1.1 Personal data categories

During your visit to the myprotergia application, the Company may process:

- (a) The data that you have entered to register at the website and the services offered (username, full name, telephone number, e-mail address, Supply Number, TIN, communication content)
- (b) Details of the meter in the facility for which a contract for electricity or gas supply has been concluded, accounts, electricity and/or gas consumption data, transaction details and payments carried out in the context of our contractual relationship, details relating to communications with Company (including requests, complaints, new orders, renewals etc.)
- (c) Personal data automatically collected during your browsing of the myprotergia application (IP address, device type, browser, redirection website, application pages that you visited, date and time of the visit)
- (d) Personal data collected automatically or entered by you while using myprotergia (replies to questionnaires, quizzes and surveys, reading of announcements or energy-saving tips and your preferences in relation to these, settings and preferences entered in the application, games that you participate in, promotional campaigns or infomercials received through myprotergia and your replies thereto).

1.2 Purposes of the processing

The processing of personal data is carried out for the following purposes:

- (a) To serve our contractual relationship so that you receive personalized information and have access to your personal documents, as well as in order for us to respond to your requests or to contact you upon your request
- (b) To establish any legitimate legal claim or defense of the Company against attempted fraud, possible cyber-attack or other illegal activities
- (c) To create anonymized statistics on the traffic and accessibility of myprotergia, so that we can proceed to the necessary steps for improving them, with the aim of improving your browsing experience
- (d) To carry out customer satisfaction surveys, advertising campaigns, energy analyses and market stratification, or other promotional activities or events
- (e) In the context of and for the purpose of carrying out energy analyses and market stratification, the Company may prepare energy profiles, in order to achieve optimal response to its customers' needs and/or to provide energy-saving advice.

1.3 Legal bases for processing

The processing of your personal data is necessary for fulfilling the aforementioned purposes. Unless otherwise specified during the collection of personal data, the legal basis for processing shall be one of the following:

- (a) processing is necessary for the execution of our contractual relationship with you (Article 6(1)(b) of the General Regulation) for the purposes under (a)

- (b) processing is necessary for the purposes of the legal interests pursued by the Company (Article 6(1)(f) of the General Regulation) for the purposes under (b) and (c)
- (c) your express consent has been provided for the processing of personal data (Article 6(1)(a) of the General Regulation) for the purposes under (d) and (e).

1.4 Recipients and transfers

Third-party IT companies, including the company INTELEN SERVICES LIMITED (processors), manage some of our websites. In such cases, we make sure through contractual terms and regular checks that the processors have access only to the data necessary for providing their services to the Company and only for the specified purposes; that they operate strictly according to the Company's instructions and that they apply all necessary technical and operational measures for the security of personal data.

Note specifically for the myprotergia application: the personal data necessary for the execution of payments (e.g. credit / debit / prepaid card details) is not collected by the Company through myprotergia. For the purposes of payment, you are redirected to secure pages within the environment of Eurobank or Piraeus Bank (IRIS Online Payments), where your payment details are collected by the relevant bank, without MYTILINEOS S.A. having access to it. Consequently, the Company does not collect, does not store and, generally, does not process – at any stage of the execution of the payment – any data necessary for the execution of the payment (e.g. credit / debit / prepaid card details such as card number, expiry date, cvv2), nor is it involved in any way in the execution of the payment.

1.5 Cookies policy

Cookies are small text files that are stored on your computer or mobile device when you visit a website.

See our Cookies Policy for the [my protergia mobile version](#) & the [my protergia web version](#)

1.6 Personal data related to minors

The Company and its websites are addressed to persons who are eighteen (18) years old or older. The Company bears no responsibility in the event that underage users visit our websites on their own accord. In the event that during the collection of data it is established that the user is a minor, the Company will not process their personal data.

2. Data retention time

The Company shall keep your personal data for as long as it is necessary to fulfill the purposes described in the present policy, unless the applicable legislation requires or allows for a longer period. The criteria governing the determination of the data retention time are as follows: (a) for the duration of the contractual relationship between us; (b) for as long as it is necessary for the Company to comply with a legal obligation imposed thereon; (c) for as long as it is required in view of the Company's legal position (such as for defense of its rights before courts, inspections by regulatory authorities etc.).

3. Technical and organizational measures

Both at the time of determining the means of processing and at the time of the processing itself, the Company shall effectively implement appropriate technical and organizational measures, such as pseudonymisation, which have been designed for the implementation of data protection principles, such as data minimization and integration of the necessary safeguards in relation to such processing, in order to meet the requirements of the applicable legislation and to protect the rights of natural persons.

4. Right to withdraw consent

In the event that you have declared your consent for the processing of specific personal data by the Company, you have the right to withdraw the said consent at any time, with deferred validity. The withdrawal of your consent does not affect the lawfulness of the processing carried out on the basis of your consent before it was withdrawn. In case of withdrawal of consent, the Company may further process personal data, only provided that there is another legal reason for the processing.

5. Subject rights

Pursuant to the applicable legislation on the protection of personal data and provided that the relevant legal requirements are met, you have the following rights:

5.1 Right to access

You have the right to be informed if the Company processes your data, to have access to the data and to receive supplementary information about its processing.

5.2 Right to rectification

You have the right to request the update, rectification or completion of your personal data.

5.3 Right to erasure

You have the right to submit a request for the erasure of your personal data, which will be satisfied provided that there is no other legal basis for processing (such as, indicatively, an obligation to process personal data which is imposed by law).

5.4 Right to restriction of processing

You have the right to request the restriction of the processing of your personal data in the following cases: (a) when you have doubts on the accuracy of the personal data and until it is verified; (b) when you object to the erasure of personal data and request, instead of erasure, the restriction of its use; (c) when the personal data is not necessary for the purposes of processing, however, it is necessary for you to establish, exercise or support legal claims; and (d) when you object to the processing and until it is verified that there are legitimate reasons that concern us and which prevail over the reasons due to which you have objected to the processing.

5.5 Right to object to the processing

You have the right to object at any time to the processing of your personal data, when this is based on the legal basis (Article 6(1)(e) or (f) of the General Regulation) which will be satisfied, unless the Company demonstrates compelling and legitimate reasons for its processing.

5.6 Right to portability

You have a right to receive your personal data, free of charge, in a structured, commonly used and machine-readable format, or to request, if technically possible, the forwarding of the data directly to another controller.

5.7 Right to object to a decision made based on automated processing

You have a right to request your exemption from decision-making based on automated processing, including profiling.

In the event that you wish to exercise one or more of your rights and for your own convenience, please use this [form](#).

6. Personal Data Controller

The Controller is the company "MYTILINEOS S.A.", with registered office in Maroussi, Attica, 8 Artemidos Street.

The Company provides support to all questions, comments, concerns or complaints related to the protection of personal data. In the event that you wish to exercise any right regarding the protection of your data, you can contact the Personal Data Protection Officer via email at DPO@mytilineos.gr or by post to:

MYTILINEOS S.A.
Attn. DPO
8 Artemidos St.
P.C. 15125 Maroussi

7. Right to appeal to the Authority

The competent authority is the Hellenic Data Protection Authority. You have the right to appeal to the Hellenic Data Protection Authority for matters relating to the processing of your personal data. You can exercise your rights in the Company before appealing to the competent Authority. You can find detailed information on the Authority's jurisdiction and on how to lodge a complaint at the Authority's website (www.dpa.gr > My rights > Submit a complaint).