

Data protection and information security

MEDNET GREECE Service Provision Commercial Societe Anonyme [a company incorporated under Greek law, having its registered office in Athens, Greece, as well as branch offices in Bucharest Romania and Nicosia Cyprus, hereinafter referred to as “**MedNet Greece**”] knows that it is important to you to be able to maintain your privacy while visiting our website. It is in our mutual interests that we take our responsibility to guarantee the privacy of your data very seriously, in compliance with the applicable provisions of data protection law. We use state-of-the-art technology to communicate with you while keeping your data secure.

1. Scope of application

The following privacy statement applies to MedNet Greece’s internet presence. This website contains links to third-party websites (external links), which remain the responsibility of the respective operators. Should you notice that our website contains a link to a site whose content violates applicable law, please let us know at dpo@mednet.com.gr.

We will then remove such link from our website without delay. MedNet Greece assumes no responsibility as to the topicality, correctness, completeness or quality of the information provided.

2. Use of your data

We would hereby like to explain how your personal data will be processed when you visit MedNet Greece’s website, and to inform you of your rights under data protection law.

2.1. Who is responsible for processing your data, and who is our Data Protection Officer?

MEDNET GREECE Service Provision Commercial Societe Anonyme
3, Pergamou street
17121 Athens, Greece
Tel.: +30 21 0930 7900
Fax: +30 21 0930 7601
Email: dpo@mednet.com.gr

If you are located in Cyprus:
MedNet GREECE SA - CYPRUS Branch
2, Amfipoleos Street, Markou Tower
2025 Strovolos, Nicosia - CYPRUS
Tel.: +357 22450752
Fax: +357 22519819
Email: dpo@mednet.com.gr

If your are located in Romania:
MedNet GREECE SA - ROMANIA Branch
54B, Iancu de Hunedoara Bd. 54B, Iancu de Hunedoara Bd.
Avantgarde Office Building, 1st floor
Bucharest - ROMANIA
Tel.: +40 314335040
Fax: +40 314377184
Email: dpo@mednet.com.gr

You may contact our Data Protection Officer, Mrs Vassiliki Kyriakidi, +302019307907, email: dpo@mednet.com.gr.

2.2 What categories of data do we use, and where do we get it from?

You are generally free to use visit our website anonymously. MedNet Greece does not save any personal or traceable data (e.g. IP addresses) of visitors to its website. We collect impersonal data about visits to our website (date, time, pages visited, navigation, software used) to have user habits anonymously analysed by an external service provider. The data is rendered anonymous before it is saved by the service provider.

2.3. For which purposes is the data processed?

If you disclose your personal data to us in specific circumstances (for example, by filling out a contact form), we handle such data confidentially, in accordance with the data protection regulations in effect at our Company's registered office. If you send us an email, or if you complete and submit an on-line form on our website, we will use any personal data you provide (such as your name or email address) only to correspond with you, to send you the information you requested, or for the other purpose(s) stipulated on the particular form.

For legal or technical reasons, personal data may also be collected and communicated to us in an encrypted form from areas on our website that are accessible only to users with special authorisation. The amount of data collected depends on the application used.

For every application where we collect your personal data, we will provide an individualised privacy statement to inform you about the processing of your data.

2.4 What is the legal basis for our processing of your personal data?

We process your data on the basis of the provisions of the EU General Data Protection Regulation (GDPR), and all other laws applicable to the processing of personal data.

The substantive legal grounds for the processing depend on the context and the purpose for which we collect your data. For that reason, we will be informing you separately via individualised privacy statements in the respective application or process.

As a rule, we collect and process your personal data to communicate with you and send you the information that you request. This may be necessary, in the context of a contractual relationship, to fulfil a contract or during the pre-contractual process (for example, job application process), or at your request. Where the applications are restricted-access (for example, job applicant or shareholder portals), the user or data subject's consent may constitute the legal grounds.

2.5 Who receives your data?

Within MedNet Greece, only those staff and departments that are responsible for the respective process will receive your data; a clear distribution of responsibilities and access concept applies in this respect. The data may also be disclosed to service providers for the purposes set out above. Using service providers is necessary, for example, for the administration and maintenance of our IT systems. We also use external service providers for support when managing job applicants, for example. If we process any of your personal data for certain purposes, you will receive a notice about how exactly your data is being used.

Service providers that we use to send you the requested information (such as brochures by mail, issuing newsletters) will receive your required personal data (e.g. postal services receive your name and address).

2.6. Will we send your data to third countries?

If personal data needs to be transferred to service providers or Group companies outside the European Economic Area (EEA), this will be done only if the European Commission has confirmed that the respective country's level of data protection is sufficient, or if data protection is otherwise sufficiently guaranteed (for example through standard EU contractual clauses, Privacy Shield).

You may also request the information from the aforementioned contact person.

2.7 What measures do we have in place to protect your data?

We have state-of-the-art technical and organisational security measures to protect data against accidental or intentional manipulation, loss, destruction, and access by unauthorised parties. We use Secure Socket Layer (SSL) encryption to protect any information you enter in dialogue forms on our web pages. SSL encryption protects your data against unauthorised third-party access during transfer. You can recognise an encrypted connection by the change in your browser address line from “http://” to “https://”, and the padlock symbol appearing in your browser window.

For your own security, please always use our contact forms. If you send us unencrypted data in a normal, unprotected email, it is possible that unauthorised parties may gain knowledge of or modify your data during transmission via the internet.

2.8 What data protection rights can you claim as a data subject?

At the address indicated above, you may request information about the personal data we have stored under your name. In addition, under certain conditions you may request that your data be deleted or corrected. Furthermore, you may also have a right to restrict the processing of your data and a right to disclosure of the data you have made available in a structured, common and machine-readable format.

2.9 Right to object

If we process your data for the purposes of safeguarding legitimate interests, you may object to this processing on grounds relating to your particular situation. We will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or if the processing serves the assertion, exercise or defence of legal claims.

If we are processing your data based on your consent, you may revoke this consent at any time with respect to future processing.

2.10 Who can you contact if you have a complaint?

If you have a complaint, you may contact the aforementioned Data Protection Officer, or the state data protection authority. The authority responsible for MedNet Greece is:

Hellenic Data Protection Authority

Kifissias 1-3,
115 23 Athens, Greece
<http://www.dpa.gr>
Email: contact@dpa.gr

If you are located in Cyprus you may contact:

The Office of the Commissioner for Personal Data Protection

Iasonos 1
1082 Nicosia, Cyprus
P.O. Box 23378, 1682 Nicosia, Cyprus
Tel: +357 22818456
Fax: +357 22304565,
Email: commissionerdataprotection.gov.cy

If you are located in Romania:

The National Supervisory Authority for Personal Data Processing

28 30 Magheru Blvd, District 1, Bucharest
Tel: +40 318 059 211,
Fax: +40 318 059 602
www.dataprotection.ro

2.11 How long will your data be stored?

We will delete your personal data as soon as it is no longer required for the purposes set out above. The applicable retention periods usually last up to ten years. In addition, it is possible that your personal data may be stored until legal claims may no longer be asserted against us (statutory limitation periods of between 6 and 20 years, which may be suspended or renewed in accordance with applicable legislation). Further details will be provided, where applicable, for the respective types of data processing.

2.12 Are you required to provide us with your data?

You are not required to provide personal data when accessing MedNet Greece's website. However, there are services for which we require personal data from you – for example, to send you information, a newsletter you have requested, details about a contract, or to take your application into account for a job opening. Without this data, MedNet Greece cannot carry out the services you request. We collect only the data that is required in a particular case. Where we do process your personal data, we will inform you separately about the purposes, recipients, legal basis and any other rights you may have.

2.13 Do we apply automated decision-making or profiling measures?

Where we use any purely automated processes – including profiling – to make a decision in a specific case, we will inform you about this in the respective application.

2.14. Use of your data in specific processes

Statutory information requirements apply under the applicable data protection legislation and in particular the European Union General Data Protection Regulation, as soon as personal data is collected from you for processing. For this reason, corresponding notices about how your personal data is used will in future be contained in company documents, but also during various processes (job application proceedings, newsletter subscriptions, surveys, etc.). Where MedNet Greece receives personal data, it will inform you about this in the specific case.

2.15 Amendment of this data protection statement

The continual improvement of our website, and the use of new technology, make it necessary to amend our data protection statement from time to time. When visiting our website, please read the current version of our data protection statement.

3. Internet presence

3.1 Use of cookies

During your on-line visit, your computer saves cookies – small files that control how our website is displayed and operates. Cookies do not damage your computer and do not contain viruses. Cookies serve to make our internet presence more user-friendly, effective and secure.

Most of the cookies we use are session cookies, which are automatically deleted when you leave our site. Other cookies remain on your computer until you delete them. Those cookies allow us to recognise your browser the next time you visit, and the browser settings allow previously viewed pages to load faster, for example. We use cookies to offer you the best possible experience on our website.

We therefore save them and analyse their data – although they do not identify you personally. This improves the usefulness of our website. We perform anonymous statistical analyses of our internet presence, and do not make any personal reference to you.

You can change your browser settings so that you are notified when cookies are being used, and you can allow them only once, or refuse them in certain cases or completely. You may also activate the automatic deletion of cookies when you close your browser. Deactivating cookies may restrict website functionality.

3.2 Server log files

The information that your browser automatically sends us is collected automatically and saved in server log files. They contain:

- Browser type and version
- Operating system used
- Referrer URL (the URL that the user comes from)
- Host name (network name) of the accessing computer (no IP addresses)
- Time of server request

This data cannot be traced to individuals, nor do we merge the data with other data sources. We reserve the right to review the information subsequently and report it to authorities (such as the police or public prosecutor's office), if there are firm indications that our internet presence is being used illegally (for example, a hacking attack on our network).

4. Use of social networks

Social media functions and social plug-ins are embedded in our website in the form of small icons. We currently embed the RSS notifications.

By default, MedNet Greece exclusively embeds **deactivated** icons, which do not contact the servers of these external networks when MedNet Greece's website is accessed. The buttons become active and create a connection only if you deliberately click an icon, thus indicating your consent to communicating with such providers. By entering your personal login data to these networks, you create a connection to yourself.

You thus leave MedNet Greece's internet presence and our sphere of influence. MedNet Greece does not record which external network you activate. The next time you visit MedNet Greece's website, the social media plug-ins return to their inactive modus, ensuring that no data is automatically communicated to social media upon such return visit.

When you interact with the social plug-ins – for example, by entering a comment – a corresponding notification is sent to the social network and saved in accordance with the respective network's policy. Please consult the respect social network's data protection statement with regard to the scope and purpose of the data collected, its use and processing, as well as your respective rights and options in protecting your privacy.

5. Email

The email address you provide will be used by MedNet Greece to reply to you with the information you request. Any personal or confidential information will be encrypted or, if this is not possible, sent to you by regular mail. If the contents of the email refer to a contractual relationship, MedNet Greece will save the email. The email address will be saved exclusively for corresponding with you, and not disclosed to third parties. You will never receive an unsolicited email from us. As a result, should you nevertheless receive any unsolicited email that purports to be from us, it is fraudulent and should be deleted. Before you send to MedNet Greece an unencrypted email, please remember that its contents are not protected against unauthorised access or manipulation.