

Papantoniou Supermarkets –

DIRECT MARKETING AND PROMOTION POLICY

Introduction

For the purposes of this policy, C.A.C. Papantoniou Trading Ltd, "the Company", with registration number H.E. 211975, manager of the trademark "Papantoniou Supermarkets" (hereinafter "Papantoniou") is responsible for the processing of personal data. For our Company, the respect of your personal data is of our highest priorities as well as of electronic transactions, taking all the necessary technical and organizational measures and at the same time observing the current legislation.

Customers, employees, partners and visitors to our website must feel safe and confident when giving, collecting and processing their data, and to consider the implementation of data protection as a characteristic of the quality of service provided. For Papantoniou, the processing of personal data is an integral part of the ongoing effort to improve its services and is committed to comply with current legislation and implement this policy

This current policy statement is a brief on how we collect and process customer, employee, and visitor personal information to provide service for them, update them for new offers, and promote new services through the use of appropriate security tools and techniques. It also aims to inform them about their rights in accordance with applicable law.

Papantoniou reserves the right to renew or update this policy without any notice in accordance with applicable national and Community legislation. When a change is made, we will make earlier versions available on request so that you can see what those changes are. If these changes change key elements of this Policy or its meaning, we will notify you in advance of these changes.

Direct Marketing

The Law of the Regulation of Electronic Communications and Postal Services (Law 112 (I) / 2004), as amended, in Part 14, transposes the provisions of Directive 2002/58 / EC on the protection of privacy in the field of Electronic Communications.

Article 106 of this Act regulates the sending of advertising messages for the purposes of direct marketing **by electronic means**.

Law 112 (I) / 2004, as amended, refers to advertising messages in which individuals or companies advertise goods or services offered directly to specific individuals using electronic means, including automated call systems, e-mail , text messages (sms) and fax machines.

Article 106 of the Law regulates direct commercial promotion to **natural persons**. Pursuant to the Legal Entities (Safeguarding legitimate interest regarding Unsolicited Communications) Law of 2005, issued by the Commissioner for Regulation of Electronic

Communications and Posts, the protection against sending unsolicited advertising messages has been extended to **legal entities**.

Consent

The current legislation states that in order to send advertising messages for direct marketing, the consent of the recipients of the messages must be **obtained in advance**, ie the "Opt-in" principle applies. Therefore, Papantoniou ensures that obtained your written consent before to send any direct marketing material.

"Consent" of the data subject means any free, express and specific expression of intent, expressed in a clear and fully informed manner and by which the data subject, after being informed in advance, accepts the processing of personal data which the concern.

Papantoniou when receiving the consent records data such as the date and time that the consent has been obtained so that in cases of control or examination of complaints to be able to prove that they have received the consent of the recipients.

Sending messages and / or emails to customers

Papantoniou may send messages and / or emails to our customers, but recipients are given the opportunity, in every message and / or email, to ask to stop receiving them **free of charge** and in an easy way.

Along with each message and / or email that is sent, there are instructions that explain to the recipient how he or she can ask to stop receiving them. For example, at the end of the message we send, it is stated that those who no longer wish to receive the messages can send a message or call the toll free number, or change their notifications (if using the Papantoniou App).

Papantoniou ensures that the details of the deletion request are recorded, such as the date and timethe request for deletion was submitted.

Assigning the sending of messages to an advertising company

Papantoniou may contact advertisingcompanies to undertake to send messages on our behalf for a fee.

In these cases, Papantoniou applies the appropriate technical and organizational measures inaccordance with the General Regulation for the Protection of Personal Data in order to ensure the security of personal data and the rights of data subjects.

The rights of persons subject to treatment

Papantoniou takes seriously and promotes your own rights with respect to the collection and processing of your Personal Data. If you wish to exercise any of your following rights by email at privacy@papantoniou.com.cy or at the postal address at the end of this policy.

For your own security and for our fuller legal compliance, we reserve our right to request further information necessary to confirm your identity when responding to an existing request. If you cannotidentify yourself, we also reserve our right to refuse to respond to your request.

- I. **Right to Access:** You have the right to request information from us about your personal data stored in us, the purpose of the processing, and any third-party recipients.
- II. **Right of Rectification:** You have the right to request the immediate correction and / or completion of your personal data stored on us.
- III. **Right to limit processing:** You have the right to request the restriction of the processing of your personal data if you dispute the accuracy of your data stored in us, if the processing is illegal and if the data is no longer necessary, but you do not wish to delete the data and you require data for the foundation, exercise or support of legal rights, or in case you have notified your objection to the disclosure work.
- IV. **Right of Erasure:** You have the right to request the deletion of your personal data stored by us
- V. **Right to data portability:** You are entitled to receive a copy of the data you have provided to us, which will be sent to you or a third party in a structured, commonly used and readable format. In case you request the direct sending of data to another data controller, this will only be done if it is technically feasible.
- VI. **Right of objection:** If your personal data is processed by legitimate interests pursuant to Article 6 (1) (f) of the GDPR, you have the right to opt-out at any time in accordance with Article 21 of the GDPR.
- VII. **Right of Withdrawal of Consent:** You have the right to withdraw your consent to the collection of the data at any time, which will be revoked for the future. Data collected until the revocation becomes legally valid is not affected by it. We hope you understand that processing your recall may take some time for technical reasons and that you may still receive messages from us in the meantime.
- VIII. **Right to submit a complaint to the regulatory authority:** In such case where you think that your personal data processing violates data protection law or if your data protection rights have been violated in any other way, do not hesitate to contact us to inform us or file your complaint to the email dataprotection@papantoniou.com.cy or write us at the post address shown at the end of this document in order to assess it and for our internal improvement or alternatively you can file your complaint to the Data Protection Office <http://www.dataprotection.gov.cy>, the data protection supervisory authority of the Republic of Cyprus.

Data Protection Officer

The Data Protection Officer of Papantoniou (DPO) oversees compliance with this privacy notice. If you have any questions or concerns about this privacy notice or how we handle your personal information, please contact the Data Protection Officer as follows:

- Sending us a message at the e-mail address dataprotection@papantoniou.com.cy
- or
- Writing to us at:

Personal Data Protection Officer
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