

PRIVACY POLICY Q-PLAN INTERNATIONAL P.C.

INTRODUCTION

The management and personnel of Q-PLAN INTERNATIONAL (“Company”), are committed to protect your privacy and personal data, in accordance with the requirements of EU’s General Data Protection Regulation (GDPR).

The Company has appointed a Data Protection Officer (“DPO”) who assumes the responsibility for addressing any questions regarding this Privacy Policy. For any clarification regarding this privacy policy, including the submission of any request for exercising your rights, please contact our DPO using the following contact details:

CONTACT DETAILS

Company: Q-PLAN International P.C.

DPO’s name: Papadionisiou Petros

DPO’s email: papadionisiou@qplan-intl.gr

Phone number: +30 2310 411191

Street address: 11 El. Venizelou str, 55133, Kalamaria, Thessaloniki, Greece

TYPES OF DATA WE COLLECT

We only collect as many data as necessary to be able to provide you with services that correspond to your needs. These data usually come from you and include:

- **contact details** (name/ surname, email address, street address, mobile phone number, land line phone number),
- **tax details** (name, VAT number, business street address, profession),
- **financial data**, such as: bank accounts, invoices, evidence of tangible assets and financial capacity. These documents are usually required for submitting proposals and managing investment plans and innovation projects under EU and National Funding Programmes.

- **various types of personal data** (e.g. professional information) depending on the specific requirements of the projects that we undertake as these are specified in the relevant contracts with the Funding Authorities (e.g. European Commission).

WHY WE NEED YOUR DATA AND HOW WE USE THEM

We need your data to:

- issue and keep the legal tax documents regarding to the financial transactions between us (contracts, agreements, invoices, etc.);
- receive and make payments;
- comply with legally binding procedures;
- send you bids for our services after a relevant request from your side;
- receive your feedback on problems you may encounter when collaborating with us;
- communicate with you in an effective and swift manner for the purposes of our business relationship;
- submit proposals, monitor the progress of investment plans and manage projects implemented under EU and National Funding Programmes;
- send you newsletters, messages and other promotional material on topics that may interest you such as announcements of new funding Programmes.

We assure you that your data will not be used for purposes other than those mentioned in this policy without your prior notification and consent if required. Our internal processes are implemented in accordance with all confidentiality requirements included in the contracts we sign with our clients (both from the private and the public sector) and with other entities (e.g. European Commission).

CONSENT

We always ask for your consent when we intend to use your personal data for purposes other than those related to the provision of our services such as sending informational emails and newsletters.

You must know that you can always withdraw your consent by communicating with our DPO on the phone (+30 2310 411191) or by email: papadionisiou@qplan-intl.gr. With regards to the promotional messages and newsletters you can always opt out by simply clicking the link "Unsubscribe" at the end of all the relevant messages.

In the event that you provide us with personal information of a third party, you are responsible for informing the person in question of the use of his/ her data and for obtaining his/ her explicit consent that this information is provided for the purposes described above

BASES OF LAWFUL PROCESSING

The lawful bases we apply for processing your personal data are the following:

- i. performance of a contract in which you are a party or activities required for entering into such contract after a relevant request from your side (e.g. submission of a bid);
- ii. compliance with a legal obligation to which we are subject such as tax legislation or public procurement laws;
- iii. your consent when it comes to sending informational emails and newsletters;
- iv. protection of our legitimate interests, especially for purposes of safeguarding the safety of people, materials and facilities under our responsibility.

TRANSFER OF YOUR INFORMATION

We never disclose your information to third parties, except when:

- it is necessary to provide you with a service that you have requested (e.g. to send paper files with a courier service);
- it is required by a critical internal process (e.g. IT support, accounting services, etc.);
- it is imposed by Law (e.g. Tax Authorities).

Specifically, our Company discloses your personal data to the following types of recipients:

- State authorities and law enforcement agencies, when this is required for the fulfillment of a legally or administratively defined obligation or the performance of an audit (e.g. from tax authorities) and in accordance with the relevant legal procedures.
- Business partners (e.g. subcontractors, banks, accounting services, courier services, etc.).

When your data is transferred to the above third parties, we seek to minimize this data to the extent necessary to achieve the specific purpose. Unless otherwise prohibited by a legal procedure, our partners are obligated and contractually bound to protect your personal data in accordance with our policy and to comply with applicable privacy and data protection laws and regulations.

Q-PLAN INTERNATIONAL maintains a copy of its contacts list on the MailChimp platform (<http://mailchimp.com>), which is used to send bulk informational emails. The personal data

contained in this contacts list is managed and protected under Article 12 of MailChimp's Privacy Policy.

RETENTION AND ERASURE OF YOUR PERSONAL DATA

We will retain your personal data for as long as it is required to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is imposed by law. The criteria used to determine the retention period include:

- The time length of our business relationship.
- Relevant legal and contractual obligations to which we are subject (for example, tax laws require us to keep records of your transactions for a certain period, EU funded projects require us to keep records that may include personal data for certain periods).
- Safeguarding our Company from potential legal and business complications such as dispute resolution, complaint handling, fraud prevention and other illegal activities.

After the end of retention period, your personal data are destroyed, deleted or anonymized.

SECURITY

We apply security technologies, policies and others measures to protect personal data under our control from unauthorized access, inappropriate use, alteration, illegal or accidental destruction or loss. We also require from all our employees and any third party that have access to or are authorized to process your data, to be bound by a contract to protect your data.

COOKIES POLICY

Introduction

Our website, <https://qplan-intl.gr/>, uses cookies. We use cookies to improve site navigation, and to analyze our traffic. In the next paragraphs you will learn what cookies are, what cookies we use and how you can disable their use.

What are cookies?

Cookies are small alphanumeric characters files that are transferred from websites that you visit to your PC, smartphone, tablet or any other electronic device that you use for browsing. Cookies assign your computer with a unique ID, which in turn becomes your own identity each time you return to a website. Cookies do not damage your electronic equipment, nor can they read information from other files on your computer's hard drive.

Websites use cookies to “remember” for a period your actions and preferences such as language, font size and other display features. In this way you are not required to enter these preferences each time you visit a website and navigate in its pages. Furthermore, cookies help websites owners to analyze how you are using their website and whether or not you are facing problems as you navigate in them.

Personal Data protection legislation states that we can store cookies on your device if they are strictly necessary for the operation of our website. For all other types of cookies, we need your consent. You can change or withdraw your consent at any time from the Cookies Settings on our website.

What cookies do we use?

In our website, , <https://qplan-intl.gr/>, we use necessary, statistics and functional cookies. Some cookies are placed by third party services (e.g. Google analytics).

Necessary cookies

Without necessary cookies the website cannot perform its basic functions. These cookies are generally placed automatically either when a webpage is loaded or as a result of a user’s request (that cannot be fulfilled without using a relevant cookie). Usually, necessary cookies expire when you close your browser.

Statistics cookies

These cookies help us to measure our website’s traffic and where it comes from, so that we can improve its performance. Moreover, they collect information about which pages are more popular and on how visitors use our website. None of this information can be used to identify you. It is all aggregated and, therefore, anonymized. This category includes cookies from third-party analytics services such as Google Analytics. Our website uses the following statistics cookies:

Name	Provider	Purpose	Expiry	Type
_ga	Google analytics	This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the site’s analytics reports.	2 years	HTTP cookie
_gid	Google analytics	This cookie stores and updates a unique value for each page visited. It is used to generate statistical data on how the visitor uses the web site. It collects anonymized data including the number and origin of visitors and the websites they visited.	1 day	HTTP cookie
_gat	Google analytics	This cookie is used to throttle request rate, that is limiting the collection of data on high traffic sites.	1 minute	HTTP cookie

Functionality cookies

Functionality cookies allow websites to remember the user's site preferences and choices they make on the site including username, region, and language. This allows the website to provide personalized features like local news stories and weather if you share your location. They are anonymous and do not track browsing activity across other websites. Our website uses the following functionality cookies:

Name	Provider	Purpose	Expiry	Type
lang	cdn.syndication.twimg.com	It is used for storing user's language preferences to display content in this language the next time the user visits the website	Session	HTTP cookie

Removing cookies

You can delete cookies and stop them from being installed in your browser. There is no standardized way to remove cookies since different browsers clear cookies using different procedures. The following links help you manage cookies by instructing you on how to remove cookies on the Chrome, Safari, Firefox, and Internet Explorer browsers:

- [Chrome](#)
- [Safari](#)
- [Firefox](#)
- [Internet Explorer](#)

If you use a different browser, please follow the instructions provided by its manufacturer.

If you wish to stop sending your information to Google Analytics, you may install in your browser the Google Analytics Opt-out Browser Add-on.

How you can manage cookies settings

You may select and change the cookie settings (with the exception of the technically necessary cookies) by clicking on Cookie settings. By making a cookie active, you consent to its use according to the provisions of this Cookies Policy.

DISCLAIMER OF LIABILITY FOR THIRD PARTY WEBSITES

Although our site may contain links to third-party sites, we are not responsible for the privacy practices or content of these sites and we expressly disclaim any liability for any loss or damage that may be caused by the use of these links. We do not monitor the privacy practices or the content of these sites. If you have any questions about the privacy practices of another site, you should contact the site's responsible personnel. We suggest you read the privacy policy of each website you interact with, before allowing the collection and use of your personal data.

We may also provide social media features that allow you to share information on your social networks and interact with Q-PLAN INTERNATIONAL P.C. on various social media sites. The use of these social media features may result in the collection or sharing of information about you. We recommend that you check the privacy policies and regulations of the social networking sites you interact with, so that you can be sure that you understand what information may be collected, used and disclosed by these sites

PERSONAL DATA OF MINORS

We do not knowingly collect and / or retain data regarding persons under the age of 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact our DPO at papadionisiou@qplan-intl.gr. We will delete such information from our files within a reasonable time.

YOUR RIGHTS

You must know that according to General Data Protection Regulation, you have certain rights regarding your personal data under our possession. Specifically, you can ask us to:

- give you a copy of your data,
- correct your data, if you think they are not accurate,
- erase your data, if there are specific reasons to do so,
- limit the processing applied to your data,
- give your data to you in an appropriate format and to transfer them to another Company,
- stop processing your data, under certain conditions. For example, you can ask as to stop processing your data that we use to send you promotional messages and newsletters.

To ask us to do anything of the above, you can contact our DPO by phone (+30 2310 411191) and by email: papadionisiou@qplan-intl.gr.

We will promptly examine your request against the relevant requirements of the laws and regulations governing privacy and personal data protection and we will answer the latest within 30 days after receiving your request. We will ask from you some kind of identification (e.g. photocopy of your identity card or passport) to avoid non-authorized reveal of your personal data. If, for reasons of complexity of the request or a multitude of requests, we are unable to respond promptly, we will notify you within 30 days of any delay, which in no case may exceed two months from the expiration of the 30-day deadline

To ensure that your personal data are always accurate and updated, we recommend you keep us informed about your data, as needed (e.g. in case of a change in a street or email address).

If you feel that your rights regarding your personal data are being compromised, you have the right to submit a complaint to the competent Data Protection Authority: <http://www.dpa.gr>, Kifissias 1-3, T.K. 115 23, Athens, tel. 210 6475600, email: contact@dpa.gr.

REVISIONS OF THIS PRIVACY POLICY

This Privacy Policy is valid from 01/06/2020 and replaces any other previous notifications that we had issued in the past regarding our personal data management practices. We reserve the right to revise this Policy at any time. The current version will be always uploaded to our website indicating the date of entry into force, so you know when the most recent revision took place. If there are critical changes in this policy or our personal data practices change significantly in the future, we will notify you by posting the changes on our website.