



Franco Group of Companies

Privacy Notice for Third Parties

1. Introduction

“Franco Group of Companies” (hereinafter referred to as “the Group” or “the Companies of the Group”) is committed to safeguard the privacy and security of the personal data of its third parties with whom the Group comes into contact, co-operates or transacts, and to comply with the current Greek and European legal framework for the protection of their personal data.

Within this context and in compliance with the transparency and notification requirements of the General Data Protection Regulation (hereinafter referred to as “GDPR”), the Group addresses the present notice to its third parties. More specifically, the present notice describes the practices of the Group with regard to the personal data processing, i.e. the collection, registration, organization, structure, storage, adaptation or alteration, retrieval, search, use, disclosure by transmission, dissemination or any other form of making available, association or combination, restriction, deletion or destruction of the personal data of its third parties. Furthermore, the said notice describes the type of personal data being collected, the purposes for which third parties’ personal data are being processed as well as the legal basis, and their rights as data subjects.

The Group reserves the right to modify and update this notice whenever it is deemed necessary, and the changes will take effect upon their notification to the third parties, either by e-mail or by posting them on the Internet or by any other means the Group deems appropriate.

In the event that the terms of their co-operation with the Group are governed by more specific terms regarding personal data protection, these terms will apply in conjunction with these present terms. In the event of any conflict between the two, the specific terms of each co-operation will prevail.

2. Data Controllers

The present privacy notice is given by the Group and in particular by the following Companies of the Group, which act as Data Controllers.

The contact details of the Data Controllers are the following:

Company name:	Franco Compania Naviera S.A.
Registered seat:	227 Kifissias Anenue, 14561, Kifissia, Athens, Greece
Telephone:	+30 210 - 8761000
Fax:	+30 210 - 6123200
E-mail:	dpo@franco.gr

Company name:	FCN Management Inc.
Registered seat:	227 Kifissias Anenue, 14561, Kifissia, Athens, Greece
Telephone:	+30 210 - 6121792
Fax:	+30 210 - 6121793
E-mail:	dpo@franco.gr

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Company name:	FTC Inc.
Registered seat:	227 Kifissias Anenue, 14561, Kifissia, Athens, Greece
Telephone:	+30 210 - 6148793
Fax:	+30 210 - 6149461
E-mail:	dpo@franco.gr

3. Collection and Process of Personal Data

During the procedures concerning the Group's selection of third parties (i.e. pilots, technicians, surveyors, etc) as well as in the context of the Group's cooperation with them, the Companies of the Group collect personal data about its third parties, employees, business partners' contact persons and agents, any authorized representatives, and other persons with whom the Companies of the Group come into contact, or persons who may have access to and/or provide work/services on the premises of any of the Companies of the Group during the cooperation. Depending on the specific circumstances and the applicable legal provisions, the Companies of the Group may collect all or some of the following information about them:

- Personal identifiers (e.g. name, surname, date of birth, copy of ID/passport).
- Age.
- Contact details (e.g. addresses, telephone numbers, e-mail addresses).
- Educational information (e.g. CV, copy of degrees/professional certifications).
- Employment information (e.g. proof of previous working experience).
- Financial information (e.g. bank account details, invoices).
- Other CV information.
- Tax and social security identifiers (e.g. tax registration number, social security numbers).
- Details of their contractual relationship or their cooperation with any of the Companies of the Group and details about fees.
- Details that are submitted in the context of evaluation procedures or outsourced assignments to suppliers.
- Travelling information.
- CCTV footage and other information obtained through electronic means (e.g. face images and figures).
- The date and time of their entry and exit, upon entering the premises of the Companies of the Group.
- Any additional information they share with the Group.

Depending on the type of personal data and the legal basis on which the Companies of the Group perform the processing of its third parties' personal data, in case any of the 3rd party business partner refuses to provide these data to the Companies of the Group, the Companies of the Group may not be able to fulfill their contractual obligations or cooperate and in some extreme cases, it may be impossible for the Companies of the Group to continue working together.

4. Sources of data collection

The personal data of third parties may be mainly collected:

(a) From you

The Companies of the Group need to know certain information about the third parties in the context of their co-operation, in order to fulfill their contractual obligations towards them, as well as their obligations towards other third parties. There are a number of ways third parties may share information with the Companies of the Group, including:

- Filling in various company forms.
- Exchanging business cards.
- Identity information (e.g. ID or passport number) as well as the date and time of entry and exit at/from any of the Company's premises.
- Via phone.
- Through documents they send to any of the Companies of the Group.
- Through electronic communication (e-mail, website).

(b) From other sources

The Companies of the Group may also receive personal data about third parties from other sources. These sources may include other persons with whom the third parties or the Companies of the Group have previously collaborated as well as public sources (Government Gazette, GEMI, Industry Guides) where there is public information regarding the professional activity of third parties.

(c) Automatically

The personal data of third parties may be automatically collected and such automatically collected personal data may include:

- Audiovisual material (including date and time) entering an area where a CCTV system operates.

5. Data Processing Purposes

The Companies of the Group may collect and process the personal data of its third parties, as listed above, for the following purposes:

- to fulfill their contractual obligations and to work smoothly with one another.
- to ensure compliance with their legal obligations.
- to manage the risks of their business.
- for tax purposes, for pricing and proof of provision of services.
- to defend the security and protection of the Group's third parties.
- to protect the Group's property (facilities, infrastructure, equipment, etc.) and the documentation, securing and enforcement of the Group's legal claims against third parties for damages to its property.
- to improve the quality of the Group's collaborations and provision of services and the Group's unimpeded and effective communication and interaction with its third parties.
- to monitor compliance with the Group's practices and procedures.
- to evaluate their third parties.
- to establish, exercise or support their legal claims.

The Companies of the Group collect and process their third parties' personal data solely for the aforementioned purposes and only to the extent strictly necessary to effectively serve those purposes. These

data are always concise, relevant and not more than required for the purposes as set out above are accurate and, where appropriate, are subject to consultation.

6. Legal basis

The Companies of the Group use the personal information of their third parties only when there is a valid legal basis allows it to do so. Most commonly, the Companies of the Group use the personal data of its third parties, when there is one of the following legal basis:

(a) where the processing is necessary for the fulfillment of any of the Companies' contractual obligations.

[Article 6 (1) (b) of the GDPR]

(b) Where the processing is necessary for the Company to comply with its legal obligations.

[Article 6 (1) (c) of the GDPR]

(c) Where it is necessary for the purposes of the legitimate interests pursued by any of the Companies.

[Article 6 (1) (f) of the GDPR]

(d) Where the third parties provide their consent to any of the Companies to process their personal data (in extremely rare and limited cases).

[Article 6 (1) (a) of the GDPR]

For example, the Group may ask for the consent of its third parties in order to promote their information to third parties who may be interested in the services they provide or to publish their information in corporate forms.

7. Data transfers

The Group does not in any way transfer the personal data of its third parties nor does it interconnect its files for any financial or other consideration with any third party private enterprises, natural or legal persons, public authorities or services or other organizations.

The Group may provide access or forward the personal data of its third parties to:

Third-party business providers, who perform various functions (including security and insurance services) and external consultants, associates, lawyers, accountants, auditors, as well as technical and support service providers and IT consultants on behalf of any of the Companies.

Financial institutions/banks, with whom the Group may exchange personal data of its third parties, in order to process payments.

The processing of its third parties' personal data by its Group's above-mentioned affiliates is under its Group's control and is conducted only at its Group's command and is subject to the same privacy policy or a policy providing, at least, the same level of protection.

Furthermore, the Group may transfer the personal data of its third parties under its regulatory obligations to:

Tax, audit and other public authorities, when the Group believes in good faith that the Law or other regulatory Act obliges the Group to provide access or forward such data.

Police and other competent law enforcement authorities or administrative authorities, if it is required by the Law or any other lawful enforceable Act or order.

Where any of the Companies of the Group engages a third party, (i.e. a processor) to process the personal data of its 3rd party business parties on its behalf, the Company will delegate such processing in writing, will choose a processor that provides sufficient guarantees with respect to technical and organizational security measures governing the relevant processing, and will obligate the processor to act only on the Company's behalf and under the Company's instructions. In addition, the Company will impose in writing appropriate data protection and information security requirements on such processors.

Any data transfer to third countries outside the European Economic Area (i.e. outside the Member States of the European Union, Norway, Iceland and Liechtenstein) will only be made in compliance with the data protection legislative framework (art. 45,46 and 49 of the GDPR) and only when adequate safeguards are in place to protect the personal data of its third parties.

If the any of the Companies of the Group is merged or acquired by another company in the future, third parties' personal data may be disclosed as part of the merger or the acquisition of the Company.

8. Data Security

How the Group processes personal data is conducted in a way that ensures its confidentiality.

The Group has put in place appropriate security measures to prevent the personal data of its third parties from being accidentally or unlawfully destroyed, lost, altered, disclosed or accessed in an unauthorized way or otherwise processed. In addition, the Group will limit access to the personal data of its third parties to those parties who have a need to know for executing the tasks assigned to them (restricted access to authorized personnel). In any case, these parties will only process the personal data of its third parties on the Group's instructions.

Furthermore, the Group has put in place procedures to deal with any (suspected) personal data breach, and the Group will notify the personal data breach to the 3rd party business partner and the Hellenic Data Protection Authority according to the relevant GDPR provisions, so as to be in compliance with its legal obligations relating to the personal data breach.

9. Data Storage

The personal data of its third parties are stored in servers located in countries within the European Economic Area (EEA) and they are not transferred to third counties (countries outside the EU/EEA).

The countries of the European Economic Area are considered to provide the same level of personal data protection as Greece. If any of the Companies of the Group transfer the personal data of its third parties outside of the European Economic Area, the Group is legally required to notify the purposes of this data transfer to the third parties and to ensure the appropriate safeguards for the protection of their personal data being transmitted.

10. Data Retention

The Group will retain the personal data in accordance with the applicable legal provisions and only for as long as it is required to fulfill the purposes set in Sections 5 and 6 of the present notice or for the time required by the law or for the defense of the Group against possible legal action to pursue claims. Details of retention periods for different aspects of third parties' personal data are available in the Group's retention policy.

To determine the appropriate retention period for the personal data of its third parties, the Group may consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of their personal data, the purposes for which any of the Companies processes their personal data and whether the Group can achieve those purposes through other means, and the applicable legal requirements.

11. Their rights as Data Subjects

One of the basic principles of the GDPR is to protect the rights of individuals with regard to the processing of their personal data. In this context, the third parties have a set of rights with respect to their personal data processed by the Companies of the Group. In particular and in accordance with the GDPR, they have the right to:

- Request and receive clear, transparent and easily understandable information regarding the processing of the personal data concerning them. **(Right to information/communication)**.
- Have access to their personal data **(Right of access)**.
- Request correction of their personal data, in case they are inaccurate or incomplete. **(Right to rectification)**.
- Request erasure or deletion of their personal data when they are no longer necessary for the purposes collected or when there is no legitimate reason for the Group to continue processing them. The right of deletion is not absolute, especially in cases when there is a particular legal obligation or other legitimate reason for the Group to retain their personal data. **(Right to deletion)**.
- Request the restriction of processing of their personal data under specific circumstances **(Right to limit the processing)**.
- Request their personal data to be forwarded by the Group to other Data Controllers **(Right to data portability)**.
- Object to processing of their personal information especially when their personal information are processed for purposes of the Company's legitimate interest. **(Right of objection)**.
- Withdraw their consent at any time, without prejudice to the lawfulness of the consent-based processing prior to its revocation, via e-mail to: dpo@franco.gr **(Right to withdrawing consent)**.
- Make a complain to the Hellenic Data Protection Authority. The 3rd party business partner can contact the Hellenic Greek Data Protection Authority to the following contact details: (a) Address: 1-3 Kifissias, 11523, Athens, (b) Telephone: +30 210 6475600 (c) Fax: +30 210 6475628 (d) E-mail: contact@dpa.gr **(Right to submitting a complaint)**.

Third parties requiring more information about how to exercise any of the abovementioned rights, or wishing to address any questions regarding this privacy notice, may contact the Group by email in the following e-mail address: dpo@franco.gr

12. Definitions

For the purposes of the present Notice:

- **“General Data Protection Regulation” (“GDPR”)** mean the European Union Regulation aiming at harmonizing European legislation on the protection of personal data. GDPR entered into force on 25 May 2018.
- **“personal data”** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in

particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

- **“third parties”**: Persons who may have access at the premises of the Companies of the Group and / or provide or receive products or services on the basis of their contractual relationship or cooperation with any of the Companies of the Group (e.g. suppliers, affiliates, technicians, electricians, repairers, pilots, armed guards, surveyors, brokers, operators, vendors etc.), including, employees and contact persons of third parties, representatives, agents and other persons with whom the Companies of the Group come into contact, or who may have access to and / or provide work / services at the premises of the Companies of the Group.
- **“processing”** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **“data controller”** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **“processor”** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- **“restriction of processing”** means the marking of stored personal data with the aim of limiting their processing in the future;
- **“personal data breach”** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;