# Privacy Policy for www.akinitapolis.gr

This Privacy Policy (hereinafter "Policy") aims to provide clear and comprehensive information on the processing of your personal data when you visit, use or register on www.akinitapolis.gr (hereinafter "Website").

The Website is the website of Akinita Polis Kosmas Theodoridis Real Estate Broker, established at 19 Kanari St, Athens 106 73, Greece (hereinafter "Polis Properties").

Protecting your personal data is a legal obligation as well as an important priority for Polis Properties. Polis Properties is the Data Controller for any personal data that you may in any way submit or provide during your navigation on the Website.

Please do not hesitate to contact us at info@akinitapolis.gr for any questions concerning the processing of your Data.

# Our Policy in simple words:

#### What is considered Personal Data?

The term "Personal Data" (hereinafter "Data"), as used in this Policy, refers to information relating to your person, such as your name, your email address, your phone number, etc.

Different pieces of information, which combined can lead to your identification, are also considered personal data.

### What does Personal Data processing refers to?

Personal data processing refers to any action performed on your personal data, e.g. collecting, registering, organizing, storing, customizing, modifying, retrieving, searching, sorting, using, disclosing, transferring, transmitting, disseminating, correlating, combining, limiting, deleting or destroying your personal data.

#### What Data do we collect on www.intelligentmedia.gr?

During your visit and navigation on the Website we may collect the following Data:

- 1. Data you submit to us on the website Contact Form.
- 2. Data you submit to us on the website user Register Form.
- 3. Data you submit to us on the website property Request Form.
- 4. Data you submit to us on the website property Assign Form.
- 5. Data collected during your visit by cookies that you have consented through the cookie control tool of the Website. Details on the cookie control tool and the use of cookies can be found in our Cookie Policy.

## For what purposes and on what legal basis do we process your Data?

We only process your Data in accordance with applicable national and EU law and for the following purposes:

- 1. Contacting you with the information you request on the contact form.
- 2. Creating your individual user account so that you can save your favorite real estate and searches, receive alerts in your e-mail for new real estate, enter the demand for the property you are looking for and for receiving our Newsletter.
- 3. Allowing you to submit specific criteria for properties that you are interested to buy or rent.
- 4. Allowing you to submit the description of properties that you are interested to sell or let.
- 5. Monitoring and analyzing traffic to the Website.

The legal basis for the all above cases of processing of your Data is your consent.

## How can you withdraw your consent?

You have the right to withdraw your consent at any time and for any of the Data processing purposes for which you have consented, and we will cease the processing.

The withdrawal of your consent will not affect the lawfulness of any Data processing that was based on your consent before its withdrawal (GDPR article 7. 3).

In order to withdraw your consent, please send us an email to info@akinitapolis.gr, with the subject "Withdrawal of consent".

In the email please state your full name and the Data processing purposes for which you want to withdraw your consent (e.g. I want to withdraw my consent for the processing of my personal data in the context of the website Contact Form. Signed: First name, Last name).

Alternatively, you may send us a letter with similar content to: Polis Properties Kosmas Theodoridis, 19, Kanari St., Athens 106 73 Greece.

In order to lawfully fulfil your consent withdrawal request, we may have to verify your identity.

If you wish to withdraw or alter your consent on the use of cookies please consult our Cookie Policy for instructions.

## Who has access to your Data?

Your Data is only accessible to the strictly necessary Polis Properties personnel in the context of the performance of their duties. Polis Properties personnel is bound by appropriate confidentiality and non-disclosure agreements.

Your Data may also be disclosed to companies within the EU, or companies outside the EU that comply with the conditions laid down by the GDPR, contracted by us to provide part or all of the features and services offered by the Website (hereinafter "Data Processors").

Such companies are designated as Data Processors and will only process your Data on our behalf, in accordance with our instructions and in compliance with applicable national and EU law (GDPR EU 2016/679).

In addition, we may share or disclose your data when you explicitly request it, or when required by applicable law.

## • How do we ensure that Data Processors comply to the terms of our Privacy Policy?

Data Processors are contractually bound by us to comply to the terms of our Privacy Policy, to respect your confidentiality, to not disclose your Data to third parties without previous authorization and to implement all necessary and appropriate security measures in order to protect your Data.

## • What security measures do we implement in order to protect your Data?

The protection of your Data is a legal obligation as well as an important priority for Polis Properties.

We implement all necessary and appropriate organizational and technical security measures in order to protect your Data from any form of accidental or unauthorized processing.

Our security measures are reviewed at regular intervals and updated when deemed necessary.

#### How long do we retain your Data?

We retain your Data for the time required to fulfil the purposes for which you have consented, or until you withdraw your consent for the processing.

For details on the retention time of cookies please consult our Cookie Policy.

### What rights do you have on your Data?

First of all, you have the right to be informed whether we process any Data of yours.

If we process your Data, you have the right to be informed of the purposes and the legal base of the processing, the type of Data involved, the recipients of your Data, the time for which we retain your Data, and whether your Data is used for automated decision making (GDPR article 15).

If your Data contains inaccurate or incomplete information, you have the right to ask us to rectify them, e.g. correct your name or phone number (GDPR article 16).

Subject to certain conditions, you have the right to receive your Data in a commonly used and legible format, or ask us to transfer them directly to another Data Controller (GDPR article 20).

Subject to certain conditions, you have right to ask us to erase your Data ("right to be forgotten"), e.g. if they are no longer necessary for the purposes for which they were collected (GDPR article 17).

Subject to certain conditions, you have the right to object to the processing of your Data, e.g. when your Data are processed for direct marketing purposes (GDPR article 21).

Subject to certain conditions and pending the evaluation of your objections on the processing of your Data, you have the right to request the restriction of their processing, e.g. when you are questioning their accuracy, you are requesting their erasure or you are objecting to their processing (GDPR article 18).

Polis Properties is obliged to notify all third-party recipients of your Data of any rectification or erasure of your Data or of any restriction of their processing (GDPR article 19).

Subject to certain conditions, you have the right not to be subject to decisions made solely on the basis of automated processing of your Data, including profiling (GDPR article 22).

The exercise of your rights may be subject to conditions and restrictions, in accordance with applicable national and EU law and to protect the data protection rights of third parties.

If you wish to learn more about these conditions and restrictions, please contact us at info@akinitapolis.gr.

Finally, in case you believe your rights are being infringed, you have the right to lodge a complaint with the competent supervisory authority, e.g. the Hellenic Data Protection Authority (www.dpa.gr).

## • How can you exercise the rights you have on your Data?

In order to exercise your rights, please send us an email to info@akinitapolis.gr, with the subject "Exercise of data subject rights".

In the email please state your full name and the purpose of your request: access, correction or erasure of Data, withdrawal of consent, restriction or objection to the processing of Data.

Alternatively, you may send us a letter with similar content to: Polis Properties – Kosmas Theodoridis, 19, Kanari St., Athens 106 73 Greece.

In order to lawfully respond to any request for the exercise of your above rights, we may have to verify your identity.

#### • How quickly do we respond to the submission of a request to exercise your rights?

We will review and respond free of charge to the submission of a request to exercise your rights the soonest possible and in any case within one month of receiving it.

In exceptional cases involving complex or a large number of pending requests, we may notify you of an extension of up to two more months.

Please be informed that we may charge a reasonable administrative fee or refuse to respond to requests that are manifestly unfounded, excessive, or recurring in nature.

#### • How can you receive a status update on a request that you have submitted?

If you wish to receive a status update on a request that you have submitted, please send us an email to info@akinitapolis.gr, with the subject "Status update on data subject request".

In the email please state your full name and the request on which you want to receive a status update: access, correction or erasure of Data, withdrawal of consent, restriction or objection to the processing of Data.

### Do we use automated decision-making, including profiling?

We do not make use of automated decision-making, including profiling.

#### • How secure are the links that we provide to other websites?

The Website may contain useful links to websites of other organizations that we consider trustworthy. However, following such links is at your own risk, as we cannot take responsibility for the privacy policies, practices and contents of third-party websites and services.

## • Do we process personal data of children?

We do not process personal data of children below the age of 18 years old without the consent of the holders of parental responsibility.

If we become aware that we are inadvertently in possession of such data, we take corrective action as soon as possible.

## • Which is the applicable law for the processing of your Data?

We process your Data in accordance with applicable Greek and EU law (GDPR, EU 679/2016).

# • How can you be notified of changes to this Policy?

We update our Privacy Policy whenever necessary. Updates to the Policy come into force immediately when published on the Website.

Whenever the Policy is amended in a significant way we will notify you by posting a notice on a prominent area of the Website or by any other appropriate means.

Your continued use of the Website and its services are subject to the terms of the current Policy. We encourage you to always consult the current Policy in order to be properly informed on its terms.