

# **Privacy Policy**

#### 1 Introduction

M-STAT is a leading A2P company providing integrated mobile solutions and value-added services to the Greek and International market.

#### **Contact info**

M-STAT S.A. Service Provision, Software development & Broadcasting material 6 Irodotou street, 10674, Athens, Greece

The Company assures that it provides its services with full respect for the personal data communicated to it and ensures that the processing of all data relating to natural persons is carried out in full compliance with the principles of lawfulness, transparency and accuracy of the information and with full security on the confidentiality, integrity and availability of such data. The Company fully complies with the relevant privacy laws.

# 2. Processing

# a) Collection

M-STAT collects only the personal data entered by users / members when registering with the site. In particular, M-STAT collects e-mail and IP addresses.

M-STAT has assigned the task of data collection only to specific persons.

# b) Use

The purpose of processing is the sending of M-STAT newsletters to users/members. The Company will process the data until the user/member states that (s)he no longer wishes to receive newsletters or close down his/her account. If the account is deleted and/or closed down, the Company undertakes to immediately and permanently delete the data and/or account of the user/member requesting the deletion and/or closing of the account.

## c) Storage - security

The Company makes every effort to ensure that the personal data collected are protected against accidental and unlawful intrusion, alteration and destruction and against any other illegal action. For this purpose, the Company is ISO 27001 certified and uses all the widely recognized means and security systems. Data is stored on proprietary servers in the company's datacenter, which operates in an ISO 27001 certified collocation service provider in Attica. All company systems are protected by firewall while encryption is used when transferring data.

In the case of "links" to other sites, <a href="www.m-stat.gr">www.m-stat.gr</a> is not responsible for the terms and conditions for the management and protection of personal data by those sites.

# (d) Disclosure - Disclosure

M-STAT does not disclose to third parties the data it collects. However, at the request of the competent authorities, following lawful procedures, data may also be accessed by them. The Company will not use other processors (subcontractors) for processing purposes unless it first obtains the written (or digital) consent of its members/users. In this case, the Company undertakes to sign contracts with strict provisions on the protection of the data transmitted. All M-STAT staff is bound by confidentiality even after the termination of the contract linking each employee to the Company.

M-STAT does not transmit your data outside the EEA.

#### 3. Safety measures

The Company has appointed a Data Protection Officer (DPO). It also takes all the physical, technical and organizational measures to secure data security and access to it.

## 4. Cookies

## **About cookies**

Cookies are small text files that contain information stored in your computer's web browser while browsing M-STAT's website and can be removed at any time. We use cookies for the best possible operation of m-stat.gr, your correct browsing, linking and moving to the pages. We also use cookies to analyze how visitors use m-stat.gr, how they are browsing, or whether they are experiencing a problem to fix it, and to improve the structure and content of m-stat.gr.

#### What information do we collect?

The cookies and information collected are divided into the following categories:

## Absolutely necessary

The absolutely necessary cookies are essential for the proper operation of m-stat.gr. They allow you to navigate and properly use the site features.

Without these cookies, we cannot provide effective m-stat.gr functionality.

### **Targeting Cookies**

M-stat.gr uses the Google Analytics service for statistical purposes. However, Google Analytics may use your information to provide you with ads when you browse through other websites.

You can also completely delete cookies by following the instructions below, depending on the browser you are using:

- Chrome
- Safari
- Firefox
- Internet Explorer

# 5. Questions, Requests, Complaints to the Company

Each user/member, upon request, has the right to access his/her data. In addition, the subject has the right: a) to contest the validity of the data, b) to request suspension, withdrawal, prohibition, deletion of the processing of his/her personal data and to communicate withdrawal of his/her consent from the processing of his/her personal data, c) to know the means of data protection as well as all the ways of processing carried out by the Company and request a copy of his/her data and d) to file a complaint and to claim compensation if (s)he proves that (s)he has suffered damage because of inaccurate, false, outdated or illegally collected data. They also maintain the right to submit complaints to the Personal Data Protection Authority.

The Company will attempt to respond as quickly as possible to the requests of each user/member. One week time is considered reasonable.

# 6. Change of data protection policy

M-STAT reserves the right to unilaterally change its privacy policy. However, in this case the user/member will be informed so that (s)he can give his/her consent. If (s)he does not agree then M-STAT will inform him/her that his/her data will be deleted.

#### 7. Way of communication

For any issue regarding your personal information you can contact M-STAT in the following ways: by phone (+30 2103389590) and by Email in the following addresses: <a href="mailto:info@m-stat.gr">info@m-stat.gr</a> and <a href="mailto:sms@m-stat.gr">sms@m-stat.gr</a>

If you wish to modify or delete your data, you will need to send us in writing exactly the items you wish to modify / delete and in case of simple modification the new elements you want to add. You can also modify or delete your details by clicking here.

#### 8. Jurisdiction

This statement is governed by the provisions of Greek law. For any dispute that may arise in relation to personal data, exclusive jurisdiction is conferred upon the courts of Athens and the Greek law is the only applicable law.

#### **ANNEX**

#### **Definitions**

- (1) 'Personal data' (or data) means any information relating to an identified or identifiable natural person ('data subject').
- (2) 'processing' means '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.
- 3) 'Pseudonymization' means the processing of personal data in such a way that data can no longer be attributed to a particular data subject without the use of supplementary information provided that such additional information is kept separate and subject to technical and organizational measures to ensure that they cannot be attributed to an identified or identifiable natural person.
- 4) 'Archiving' means the structure of a set of personal data which is accessible according to specific criteria, whether that database is concentrated or decentralized or distributed on a functional or geographic basis.
- 5) 'Data subject' means the natural person whose personal data are collected. For the purpose of this data subject are the users / members.

- 6) 'Controller' means a natural or legal person, a public authority, a service or another body which, alone or jointly with others, defines the purposes and means in which personal data are processed. For the purposes of the present the controller is M-STAT.
- 7) 'Subcontractor or Processor' means a natural or legal person, a public authority, a service or another entity processing personal data on behalf of the controller.
- 8) 'Consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- 9) 'Breach of personal data' means a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure, disclosure or access to personal data transmitted, stored or otherwise processed.
- 10) 'Purpose of processing' means the reason for which the Controller is processing personal data.
- 11) 'Authorities' means all judicial and administrative authorities, whether independent or not, which have the right to require access to or request personal data held by the Company pursuant to the laws of Greece.
- 12) 'Third parties' means any natural or legal person, public authority, service or body, with the exception of the data subject, the controller, the processor, the sub-processor and their employees.
- 13) 'Staff or Employees' means all natural persons directly related to the Company, either in an employment relationship or in the provision of services, which are remunerated by the Company.