

PRIVACY POLICY

The Company recognizes the criticality of protecting the personal data of natural persons and their lawful and proper processing. In this context, the Company complies with the basic principles of personal data processing, respects the rights of natural persons, and ensures that the personal data in its possession:

- are collected for specified, explicit, and legitimate purposes, as reflected in the Record of Processing Activities it maintains, and are collected following the consent of the natural person where required,
- are processed only for the purposes for which they were collected and/or for legal and regulatory reasons and/or to defend the legitimate interests of the Company,
- are not subjected to further processing beyond the specified purpose,
- are adequate, relevant, and limited to what is strictly necessary in relation to the purposes of processing,
- are lawfully processed in accordance with the rights of natural persons, are accurate, and updated when required, especially prior to making critical decisions concerning natural persons,
- are not kept for a period longer than necessary for the purpose of the processing and/or for the Company's compliance with legal and regulatory obligations,
- are kept secure against unauthorized access, loss, or destruction,
- are transferred to other organizations (third parties or not) only on the condition that an adequate level of protection is ensured.

The above rules are observed by all employees of the Company, as well as by collaborating parties carrying out processing operations of personal data of natural persons on its behalf.

To ensure the above, the Company:

- implements an Integrated Management System covering all of its activities to monitor and audit the implementation of this policy, as well as assess its effectiveness regarding compliance with the regulatory framework and best practices for personal data protection,
- implements procedures for the full satisfaction of the rights of natural persons, responding to requests within one month of submission or within 3 months in cases where there are justified reasons for delay that have been communicated to the Data Subject within the initial month of request submission,
- informs natural persons clearly regarding the processing of their data,
- integrates personal data management requirements into all business operations and processes related to processing,
- has identified all internal and external interested parties and their requirements regarding the protection of personal data,
- has defined roles and responsibilities associated with data management,
- provides clear instructions to staff and collaborating parties performing tasks on its behalf regarding the safe use and transmission of data in accordance with the Management System,

- ensures that the transmission of data to other organizations and their processing by them on its behalf is implemented in compliance with the regulatory framework for data protection as well as this policy,
- designs, adopts, and monitors the implementation of a system of indicators and targets for the safe and lawful management of data,
- invests in continuous training, awareness, and education of its employees on personal data protection issues, as well as in the continuous improvement of know-how and its dissemination throughout the staff,
- allocates all required resources for the effective implementation of the Integrated Management System,
- has appointed a Data Protection Officer (DPO),
- communicates this policy to all personnel and ensures its continuous updating, so that full compliance with the applicable regulatory framework is achieved.

REFORMER is committed to the uninterrupted monitoring and observance of the regulatory and legislative framework and to the continuous implementation and improvement of the effectiveness of the Integrated Management System.

For the Management

Antonis Billiris

Chief Executive Officer