PRIVACY POLICY

The company named **VIPA Group HQ** with distinctive title "**VIPA GROUP**", which is based on the street Galeries Benjamin Constant, 1, 1003 Lausanne, SWITZERLAND ensures the privacy and confidentiality of your personal data, adopting the General Regulation of Personal Data Protection 679/2016 of the European Union & the current national legislation of each country active in all procedures and stages of communication with you.

Purpose of this Policy

This policy provides every natural person and every visitor/user of the company's website with concise and transparent information regarding the practices followed for the management and protection of personal data.

It concerns any transaction or series of transactions performed with or without the use of automated means, in personal data or in personal data sets, such as the collection, registration, organization, structure, storage, adaptation or modification, retrieval, search for information, use, disclosure by transmission, dissemination or any other form of disposal, association or combination, restriction, deletion or destruction.

The Policy is updated from time to time and can be modified whenever deemed necessary, without prior notice, always within the applicable legal framework and in accordance with any changes to the current legislation on personal data protection. We therefore recommend that you check this Policy at regular intervals, so that you are informed of any changes that have taken place.

Definitions

The term "personal data" hereinafter referred to as "Personal Data or Data", is any information concerning a specific natural person or person whose identity can be verified (e.g., name, identity number, address, etc.). Data related to health (physical or mental condition, receiving medical services, etc.) are included in the general term personal data; however, they constitute a special category of data.

For the purposes of this Privacy Policy, the definitions of the EU General Data Protection Regulation (GDPR) (2016/679) apply.

What kind, in what way and for what purpose is your personal data collected

Your personal data (name, city, address, e-mail address, contact phone number and tax data such as VAT number, etc.) are collected in the following ways:

(a) you provide them to us in the context of the transaction between us for the execution of our contractual obligations but also in the context of the company's compliance with its legal obligations. The processing of the personal data we receive is carried out in accordance with articles 6.1b and 6.1c of the Regulation.

(b) you provide them to us when you fill out electronic forms or send an electronic message, in order to find out about our company's products, as they are displayed on our websites https://vipagroup.com/, https://viparecycling.gr/ & https://ourteam.vipagroup.com. The submission of your basic information becomes your choice and their processing with your consent to the sole purpose of your information by our company, according to articles 6.1a and 6.1b of the Regulation.

(c) when you submit a job application to the Company. The availability of your personal data in the context of submitting a resume to find a job in the Company naturally takes place voluntarily as otherwise it would not be possible to evaluate the possibility of your recruitment. The processing is necessary to take measures at the request of the data subject before the conclusion of a contract, in accordance with article 6b of the Regulation. For more information see the CV Policy.

(d) they are provided to us by a third party of ours after you have given your consent (eg agent),

(e) automatically through the browser «browser» or the mobile device you use to access our websites https://vipagroup.com/, https://viparecycling.gr/, https://ourteam.vipagroup.com & our VIPA – Quality Mobile App to the apple store. More details about the technologies used on each of our websites are listed in the Cookies Policy.

The company will not process your personal data without your consent, if required. However, the company reserves the right, in exceptional cases, to process your personal information to the extent permitted or required by law, and/or by court decisions or prosecutorial orders/provisions.

Recipients of your data

Personal data may be transmitted to partners, or to third parties, complying with the terms of this Policy and committed to confidentiality, who act on behalf of the company for further processing for the purpose of providing services, performing the contract with our company and data management and technical support. The said third parties have contractually committed with the company, that they will use the personal data only for the above purposes, and will not transmit the personal information to third parties, as well as will not share it with third parties unless required by law.

Indicatively, disclosure of your personal information (in whole or part of it, as required each time) can be done in:

(a) all authorized persons of the company (processors) e.g. legal advisors, external accountants, etc.,

(b) external partners (advertising companies for marketing and research purposes, etc.), with the aim of implementing campaigns and promotions,

(c) support providers of these data processing systems, e.g. computerization company,

(d) judicial or supervisory or audit authorities, within the framework of their jurisdictional competence,

(e) third parties who have a legitimate interest, in establishing, exercising or supporting legal claims,

(g) companies belonging to **VIPA Group HQ**, such as VIPA (USA) INC, VIPA PACKAGING UK LIMITED, VIPA GREECE S.A, VIPA ITALY SRL, VIPA JAPAN GK, VIPA SINGAPORE PTE LTD and operating worldwide.

In cases where your consent is required to disclose your data to third parties (where they are not referred to by law), it will be expressly requested by you and you have the right at any time to withdraw it. In these cases, the company assures you that it is constantly vigilant and takes all the required security measures, so that the transfers of personal data are carried out in the safest possible way.

The company undertakes not to market your personal data by making it available for sale/rent by giving it/transporting/publicizing or communicating it to third parties or otherwise using it for other purposes that may risk your privacy, rights or your freedoms, unless required by law, court order/order, administrative act or if it is a contractual obligation necessary for the proper functioning of its websites and its activity.

Personal data may be transmitted to partners, or to third parties, complying with the terms of this Policy and committed to confidentiality, who act on behalf of the company for further processing for the purpose of providing services, performing the contract with our company and data management and technical support. The said third parties have contractually committed with the company, that they will use the personal data only for the above purposes, and will not transmit the personal information to third parties, as well as will not share it with third parties unless required by law.

Data Retention

The retention period may vary significantly depending on the type of data and how it is used. Determining the retention time of data is based on criteria such as legal retention deadlines, pending or potential disputes, intellectual property or property rights, contractual requirements, operational instructions or needs for archiving.

(a) In order to fulfill the purpose of processing related to the execution of the contract and to inform you about our products & services, the time of the relevant commercial operation of the company is judged to be a reasonable time to keep your data and in accordance with what is required by the current legislative framework that governs the operation of the company, the legislative framework that governs the company's tax obligations as well as the Personal Data Protection Legislation.

(b) In order to fulfill the purpose of the recruitment, the company undertakes to keep your CVs for one (1) year, after filling the job.

(c) Data collected through the video surveillance system on the company's premises is kept up to 15 days after which it is automatically deleted. In the event that during this period we find an incident, we isolate part of the video and keep it for up to one (1) month, in order to investigate the incident and start legal proceedings to defend our legal interests. If the incident concerns a third party, we will keep the video for up to three (3) more months.

Processing of personal data through a video surveillance system

We use a surveillance system for the purpose of protecting persons and goods. Processing is necessary for the purposes of legitimate interests that we pursue in the capacity of Controller and in accordance with article 6.1f of the Regulation.

Our legitimate interest consists in the need to protect our space and the goods found in it from illegal acts, such as but not limited to theft. The same applies to the safety of life, physical integrity, health as well as the property of our staff and third parties who are legally in the supervised area. We only collect image data and limit the download to places we have assessed that there is an increased possibility of illegal acts, e.g. theft, such as at entry, without focusing on places where the privacy of persons whose image is taken may be excessively limited, including their right to respect for personal data.

The material kept is only accessible by our competent/authorized staff in charge of site security. This material is not transmitted to third parties, with the exception of the following cases: (a) to the competent judicial, prosecutorial and police authorities when it includes information necessary for the investigation of a criminal act, which concerns persons or goods of the controller, (b) to the competent judicial, prosecutorial and police authorities when requesting data, legally, in the exercise of their duties, and (c) to the victim or perpetrator of a criminal act, when it comes to data that may be evidence of the act.

What are my rights against the processing of my personal data?

You have the right at any time to request: (a) access to your personal data, (b) correction of your personal data if it is inaccurate or incomplete, (c) deletion of your personal data, unless its processing is necessary for the exercise of the legal rights of the company or third parties, for the fulfillment of a legal obligation, for reasons of public interest or to defend our legal rights before judicial or other authorities, (d) limiting the processing of your personal data only for specific purposes (e) transferring your personal data in accordance with existing legal conditions.

In order to exercise any of the above rights, please send a relevant mail to the mail of DPO: dpo@vipagroup.com always stating your full details and the reason for your communication.

In the case of exercising one of your above rights, the company will take every possible measure to satisfy your request within one (1) month of receiving it, informing you in writing of the satisfaction of your request or of the reasons that prevent the satisfaction of one or and more of them, as well as for the reasons of any delay beyond the above period of one (1) month and in any case no later than three months. Also, the company will inform you of your further rights in case of inappropriate response. This information is provided in principle free of charge by the company, subject to the request for notification and information not to be exercised as a repetition, as an exaggeration and/or to be manifestly unjustified.

If you believe that the company in any way violates the current legislation on personal data, you reserve the right to submit a complaint/complaint to the competent Supervisory Authority for the Protection of Personal Data of each country.

In this case, we would greatly appreciate your previous communication with the company by sending mail to the mail of DPO: dpo@vipagroup.com always stating your full details and your reason for communication.