

Privacy Policy

This privacy policy governs the use of your personal data by **FOCUS Strategic Thinking Consultants** (FOCUS STC) P.C.

NOTE: If you want information on how we process personal data via cookies on our Website, you are kindly referred to our [Cookie Policy](#).

1. Who is responsible for the processing of your personal data?

- 1.1 Your personal data are processed by FOCUS STC. You can contact us via e-mail at info@focus-stc.gr
- 1.2 FOCUS STC reserves the right to modify, change or amend this Privacy Policy at its own discretion and from time to time. Such modifications, changes or amendments shall be communicated via the Website. In case of questions or comments with regard to the modifications, changes or amendments, you can inform us by sending an e-mail to info@focus-stc.gr.

2. What categories of personal data do we process?

- 2.1 When you fill in the contact form on our Website, or contact us via e-mail, telephone or Social Media Channels, we collect:
 - the basic identity information you provide us with, such as name, e-mail address, postal address, telephone number, the company you work for, your function;
 - the content of your communication and the technical details of the communication itself (with whom you correspond at our end, date and time, etc.);
 - your preferences regarding receiving our e-mail communications, such as newsletters, advertisements, etc;
 - electronic identification data, such as IP address;
 - publicly available information of your profile on Social Media Channels and any other personal data you choose to provide to us.
- 2.2 Whenever you leave us your business card or interact with us at fairs and events at which we are present, we may collect:
 - the basic identity information you provide us with, such as name, e-mail address, postal address, telephone number, the company you work for, your function (i.e. when such information is provided by you or shown on your business card);
 - your photo.

3. For what purpose do we use your personal data?

- 3.1 FOCUS STC processes your personal data to provide you in a personalised and efficient way with the information, products and/or services you request via the Website, e-mail, telephone, Social Media Channels, fairs and events.
- 3.2 FOCUS STC processes your personal data to communicate with you as a result of our contact at a trade fair and/or event or as a result of your approach via the Website, e-mail, telephone or one of our Social Media Channels.
- 3.3 FOCUS STC processes your personal data to perform statistical analyses so that we may improve our Website, our products and services or develop new products and services.
- 3.4 FOCUS STC processes your personal data to comply with legal obligations or to comply with any reasonable request from competent law enforcement agents or representatives, judicial authorities, governmental agencies or bodies, including competent data protection authorities. Your personal data may be transferred upon FOCUS STC's own initiative to the police or the

judicial authorities as evidence or if there are justified suspicions of an unlawful act or crime committed by you through your registration with or use of the Website, our Social Media Channels or other communication with us.

- 3.5 FOCUS STC may process your personal data for informing any third party in the context of a possible merger with, acquisition from/by or demerger by that third party, even if that third party is located outside the EU.
- 3.6 FOCUS STC may process your personal data for the preservation of its legitimate interests, its partners or a third party if and when your registration with, or use of, the Website, Social Media Channels or other communication channels can be considered (a) a violation of any applicable terms of use or the intellectual property rights or any other right of a third party, (b) a threat to the security or integrity of the Website, (c) a danger to the Website or any of FOCUS STC's or its subcontractors' underlying systems due to viruses, Trojan horses, spyware, malware or any other form of malicious code, or (d) in any way hateful, obscene, discriminating, racist, slanderous, spiteful, hurtful or in some other way inappropriate or illegal.
- 3.7 FOCUS STC processes your personal data mentioned under clauses 2.1, 2.2 above for marketing purposes, i.e. to provide you with targeted communications, promotions, offerings and other advertisements of the company and selected partners. FOCUS STC will only send you communications, promotions, offerings, newsletters and other advertisements via e-mail or other person-to-person electronic communications channels if you have explicitly consented to receiving such communications, newsletters and other advertisements.

4. Why is our processing of your personal data legitimate?

- 4.1 For the processing of your personal data for the purpose outlined in clause 3.1, we ask for your consent.
- 4.2 The processing of your personal data for the purpose outlined in clause 3.4 is necessary to allow FOCUS STC to comply with its legal obligations.
- 4.3 The processing of your personal data for the purposes outlined in clauses 3.2, 3.3, 3.6 and 3.7 is necessary for the purpose of the legitimate interests of FOCUS STC, which are:
 - being able to appropriately respond to your requests for information and other requests;
 - allowing us to defend ourselves in legal proceedings;
 - continuous improvements to the Website, our Social Media Channels, products and services to ensure that you have the best experience possible;
 - keeping our Website, Social Media Channels, products and services safe from misuse and illegal activity;
 - safeguarding our commercial and business interests and needs in light of changing market conditions.
 - marketing and promotion of our products, services, brands an overall successful commercialization of our products and services.
- 4.4 For processing your personal data for the purposes outlined in in clause 3.1, FOCUS STC as the responsible party asks for your consent. By consenting to our processing of your personal data for sending you communications, promotions, offerings, newsletters and other advertisements via e-mail or other person-to-person electronic communications channels, you agree that we are allowed to process your personal data for this purpose in the manner and under the conditions outlined in this Privacy Policy.

5. What are our quality assurances?

- 5.1 FOCUS STC does its utmost to process only those personal data which are necessary to achieve the purposes listed under the purpose for processing.

- 5.2 Your personal data is processed only for as long as necessary for the purposes listed above or up until such time where you withdraw your consent for processing them. FOCUS STC will de-identify your personal data when they are no longer necessary for the purposes outlined in the purpose for processing, unless there is:
- an overriding interest of FOCUS STC or any other third party in keeping your personal data identifiable;
 - a legal or regulatory obligation or a judicial or administrative order that prevents FOCUS STC from de-identifying them.
- 5.3 FOCUS STC will take the appropriate technical and organisational measures to keep your personal data safe from unauthorised access or theft as well as accidental loss, tampering or destruction. Access by personnel of FOCUS STC or its third-party processors will only be on a need-to-know basis and subject to strict confidentiality obligations. You understand, however, that safety and security are best efforts obligations only, which can never be guaranteed.

6. What are your rights?

- 6.1 You have the right to request access to all personal data processed by FOCUS STC pertaining to you. FOCUS STC reserves the right to charge an administrative fee for multiple subsequent requests for access that are clearly submitted for causing nuisance or harm to FOCUS STC.
- 6.2 You have the right to ask that any personal data pertaining to you that are inaccurate, are corrected free of charge. If a request for correction is submitted, such request shall be accompanied of proof of the flawed nature of the data for which correction is asked.
- 6.3 You have the right to withdraw your earlier given consent under clause 4.4 for processing your personal data.
- 6.4 You have the right to request that personal data pertaining to you be deleted if they are no longer required in light of the purposes which are outlined above or if you withdraw your consent for processing them. However, you need to keep in mind that a request for deletion will be evaluated by FOCUS STC against:
- overriding interests of FOCUS STC or any other third party;
 - legal or regulatory obligations or administrative or judicial orders which may contradict such deletion.

Instead of deletion you can also ask that FOCUS STC limits the processing of your personal data if and when (a) you contest the accuracy of that data, (b) the processing is illegitimate or (c) the data are no longer needed for the purposes which are outlined above, but you need them to defend yourself in judicial proceedings.

- 6.5 You have the right to oppose the processing of personal data if you are able to prove that there are serious and justified reasons connected with these particular circumstances that warrant such opposition. However, if the intended processing qualifies as direct marketing, you have the right to oppose such processing free of charge and without justification.
- 6.6 You have the right to receive from us in a structured, commonly used and machine-readable format all personal data you have provided to us.
- 6.7 If you wish to submit a request to exercise one or more of the rights listed above, you can send an e-mail to info@focus-stc.gr for all data subject rights matters. An e-mail requesting to exercise a right shall not be construed as consent with the processing of your personal data beyond what is required for handling your request. Such request should clearly state and specify which right you wish to exercise and the reasons for it if such is required. It should also be dated and signed, and accompanied by a digitally scanned copy of your valid identity card proving your identity.
- FOCUS STC will promptly inform you of having received this request. If the request proves valid, FOCUS STC shall notify it as soon as reasonably possible and at the latest thirty (30) days after having received the request.

If you have any complaint regarding the processing of your personal data by FOCUS STC, you may always contact the company via the e-mail address mentioned in the first paragraph of this clause. If you remain unsatisfied with FOCUS STC's response, you are free to file a complaint with the competent data protection authority, i.e. the data protection authority of the country where you reside or the Hellenic Data Protection Authority (www.dpa.gr).



www.focus-stc.gr

info@focus-stc.gr