

## Win Medica Privacy Notice for Partners and Suppliers

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### 1. Subject of the Privacy Statement for Partners and Suppliers

WIN MEDICA SA (hereinafter referred to as "WIN MEDICA" or "the company") in the course of its lawful activity, communicates on a regular basis and cooperates with suppliers and external partners. This Statement concerns them to the extent that due to their cooperation, the company collects and processes personal data of partners and suppliers who are natural persons or of the representatives and contact persons of the respective partners and suppliers who are legal entities.

WIN MEDICA fully respects the confidentiality of the personal data of all its partners and makes every effort to protect them, in full compliance with existing legislation and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (General Data Protection Regulation, hereinafter referred to as "the GDPR"). This Privacy Statement aims to inform the company's partners and suppliers about the manner and purpose of the collection and processing of their personal data by WIN MEDICA, as well as to explain their rights and options regarding such data, and to provide them with the required information in accordance with Articles 12 and 13 of the GDPR.

The present Privacy Notice for Partners and Suppliers relates only to personal data collected and processed in the context of the cooperation of a natural person or a representative of a legal entity with the company and does not concern any other collection and processing of personal data, which may be carried out by WIN MEDICA, in the context of other relations or collaborations with natural persons and / or in the context of other processing activities. WIN MEDICA may provide additional information/notices to its partners regarding the processing and general protection of their personal data, on a case-by-case basis and depending on the purpose of the processing. These notices are supplemented by the present Privacy Statement. In addition, in the event that an agreement between the company and the respective partner or supplier contains specific terms on data protection, these terms are supplemented by the present Privacy Notice and apply jointly with it.

### 2. Definitions

1. 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

- 1<sup>a</sup>) 'special categories of personal data': personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation;
- 2) 'processing': 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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 3) 'restriction of processing': the marking of stored personal data with the aim of limiting their processing in the future;
- 4) 'profiling': any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- 5) 'pseudonymisation': the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- 6) 'filing system': any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;
- 7) 'controller': the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by EU or Member State law;
- 8) 'processor': a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- 9) 'recipient': a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with EU or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- 10) 'third party': a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- 11) 'consent' of the data subject: 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;
- 12) 'personal data breach': a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- 13) 'genetic data': personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

- 14) 'biometric data': personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
- 15) 'data concerning health': personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;
- 16) 'main establishment':
- (a) as regards a controller with establishments in more than one Member State, the place of its central administration in the Union, unless the decisions on the purposes and means of the processing of personal data are taken in another establishment of the controller in the Union and the latter establishment has the power to have such decisions implemented, in which case the establishment having taken such decisions is to be considered to be the main establishment;
  - (b) as regards a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if the processor has no central administration in the Union, the establishment of the processor in the Union where the main processing activities in the context of the activities of an establishment of the processor take place to the extent that the processor is subject to specific obligations under this Regulation;
- 17) 'representative': a natural or legal person established in the EU who, designated by the controller or processor in writing pursuant to Article 27 of the GDPR, represents the controller or processor with regard to their respective obligations under this Regulation;
- 18) 'enterprise': a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity;
- 19) 'group of undertakings': a controlling undertaking and its controlled undertakings;
- (20) 'binding corporate rules': personal data protection policies which are adhered to by a controller or processor established on the territory of a Member State for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity;
- (21) 'supervisory authority': an independent public authority established by a Member State pursuant to Article 51 of the GDPR;
- (22) 'supervisory authority concerned': a supervisory authority which is concerned by the processing of personal data because:
- (a) the controller or processor is established on the territory of the Member State of that supervisory authority;
  - (b) data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or
  - (c) a complaint has been lodged with that supervisory authority;
- (23) 'cross-border processing':
- (a) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the EU where the controller or processor is established in more than one Member State; or
  - (b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.
- (24) 'relevant and reasoned objection': an objection to a draft decision as to whether there is an infringement of the GDPR, or whether envisaged action in relation to the controller or processor complies with the GDPR, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the EU;

- (25) 'information society service': a service as defined in point (b) of Article 1(1) of Directive (EU) 2015/1535 of the European Parliament and of the Council;
- (26) 'international organisation': an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

### **3. Controller**

WIN MEDICA SA is considered the Controller, as it is the legal entity that determines the purposes and the manner of processing personal data of its partners and suppliers according to the GDPR.

#### **WIN MEDICA S.A.**

6-8 Agisilaou Street, Marousi, Attica - 15123.

Tel: +30 210 744 88 821 - E-mail: [info@winmedica.gr](mailto:info@winmedica.gr)

### **4. Data Protection Officer (DPO)**

WIN MEDICA has appointed as its DPO, in accordance with art. 37 et seq. of the GDPR, Mr Emmanouil Terezakis: [dpo.winmedica@winmedica.gr](mailto:dpo.winmedica@winmedica.gr) .

### **5. Processing personal data of partners and suppliers**

The personal data of partners and suppliers that may be processed by WIN MEDICA are in principle the usual personal data that they may provide themselves to the company and / or that the company may collect independently when searching for and selecting new partners and suppliers but also during the cooperation with them, for the management thereof, including the information that the respective partner and supplier provides to the company at his/her discretion. Also, in addition to the data of the partners and suppliers themselves, the company may also collect and process personal data of representatives, contact persons, and employees of the partners and suppliers. In this context, as a rule, the company is not provided with special categories of personal data, in particular data concerning health.

In particular, the personal data of the above individuals that are collected and processed by the company may be: Name, Address, Telephone, E-mail, Identity Card Number (ID), Tax Identification Number (TIN) and Tax Office (DOY), Bank account number and IBAN, and information that at his/her discretion the data subject may include in his/her CV.

### **6. Purposes of processing**

The collection and processing of personal data of partners and suppliers by the company is done in accordance with applicable legislation, in full compliance with the GDPR and with full respect for the principles that govern the processing in accordance to the law. The main goal of the company is to ensure security and confidentiality and to limit the processing of data to degree that is absolutely necessary for serving the purposes set out herein below.

The company collects and processes personal data of its partners and suppliers, as detailed above, to serve specific purposes, always in the context of the respective collaboration, before, during and possibly after its expiration. Such purposes are the following:

- a. Receiving, collecting, classifying and examining the CVs of partners and suppliers.
- b. Communication with partners and suppliers.
- c. Specialized market research and the search and selection of the appropriate partners and suppliers.
- d. Communicating with third parties to get references for specific partners and suppliers.
- e. Receiving and sending offers for the conclusion of the respective cooperation agreement.
- f. The drafting, signing, observance and control of the implementation of the cooperation agreements.
- g. Keeping a list of partners and suppliers of the company.
- h. Updating of the details of the company's partners and suppliers.
- i. The management of the invoices (receipt, archiving, payment) of the partners and suppliers for their services and, in general, the management of the payment of their remuneration.
- j. The management of the termination of the cooperation with a partner or supplier.
- k. The management of the evaluation of the company's partners and suppliers.
- l. Compliance with the company's legal obligations in the context of the respective collaboration.
- m. Compliance with the company's contractual obligations and smooth development of the relations with partners and suppliers.

The company evaluates and selects the appropriate partners and suppliers, based on defined - in some cases only quantitative - criteria and in accordance with its policies, without resorting to automated decision making.

## **7. Legal basis for processing**

The processing of the personal data of its partners and suppliers by the company is lawful and is based on the conditions set by the existing legislation and in particular the GDPR.

The company primarily collects and processes personal data of its partners and suppliers, to the extent that this processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, according to article 6 par. 1 item b of the GDPR.

In addition, it is possible to process personal data necessary for the compliance of the company, in its capacity as controller, with its legal obligations, according to article 6 par. 1 item c of the GDPR, such as compliance with obligations under tax legislation. Where appropriate, it is possible that the data subject has given consent to the processing of his/her personal data for one or more specific purposes, in accordance with article 6 par. 1 item a of the GDPR, e.g. during the voluntary sending of contact details to the company's published addresses.

Also, in some cases the processing is necessary for the purposes of the legitimate interests pursued by the company in its capacity as controller, in accordance with article 6 par. 1 item f of the GDPR, to the extent that it is required e.g. for the selection of the appropriate partner and supplier for the provision of specific services, the improvement of the quality of the company's collaborations and consequently of the services provided by the company itself.

## **8. Recipients and transfer of personal data**

The personal data of the company's partners and suppliers are processed by the staff of the Procurement Department and the Technical Management Department and of the Accounting Department, the heads of each Department of the company, to which each cooperation may pertain and by the members of the company's Management, as the case may be.

In addition, recipients of personal data are the public services, authorities and bodies, to which the data are notified in accordance with the provisions of the applicable legislation and in accordance with the respective obligations of the company, such as tax, audit and other public authorities and financial institutions. Also, the company may be obliged to disclose to third parties, such as police and judicial authorities, certain personal data of its partners and suppliers, always in accordance with applicable legislation, as well as for the ascertainment and exercise of legal claims against the data subject and the protection of its rights under of the contractual relationship with the data subject.

Furthermore, the company may, on a case-by-case basis, disclose personal data of its partners and suppliers to third party collaborators of the company, for which it receives the corresponding consent from the data subjects, such as to external advisors, lawyers, law firms, accountants, and auditors. In any case, the company ensures the existence of appropriate guarantees for the safe processing of such data by third parties.

The company in no case trades and as a rule does not transfer personal data of its partners and suppliers to other countries or international organizations and undertakes to fully and clearly inform the data subject in advance, in case it intends to do so. In the event of a merger and / or acquisition of the company, personal data of its partners and suppliers may be disclosed to the respective third parties, following prior clear notice to the data subjects.

## **9. Security of personal data**

The company takes the appropriate technical and organizational measures so that the personal data of its partners and suppliers are kept secure, ensuring the appropriate level of security against potential risks. Data processing systems and services are monitored on an ongoing basis to ensure that they are kept as secure as possible and protected against loss, destruction, misuse and / or unauthorized access.

## **10. Preservation of personal data**

The personal data of the partners and suppliers are stored by the company only for the period of time required for the fulfillment of the purpose for which their collection took place, as described in this Privacy Statement, based on their nature, the contractual relationship governing their preservation and the relevant legal obligations of the company. These data are kept in each case only for a reasonable period of time and are then deleted when the purpose of their processing ceases to exist, in accordance with the applicable legislation. As a rule, and if this is possible and expedient, the individual departments of the company destroy specific physical files.

## **11. Rights of the data subjects**

Under the applicable legislation and in particular the GDPR, partners and suppliers retain the following rights, insofar as their data are processed by the company, for which in any case they may contact the company using the contact details listed below:

1. to obtain from the company confirmation as to whether or not their personal data are being processed;
2. to be granted access thereto and request a copy thereof;

3. to request rectification or completion of their personal data, if they consider them to be incorrect, inaccurate or incomplete;
4. to request erasure of their personal data; in this case, the company will erase such data, unless there exists a legal basis of entitlement or a legal obligation to maintain them;
5. to object to some or all of the purposes of processing their personal data or to request that their processing be restricted as much as possible in accordance with the law;
6. to withdraw their consent for the collection and processing of their personal data by the company, to the extent that such consent is the legal basis for the processing;
7. to lodge a complaint with a supervisory authority, in this case the Greek Data Protection Authority.

## **12. Amendments and updates of this Privacy Notice**

The company reserves the right to amend and/or update this present Privacy Notice

Η εταιρεία διατηρεί το δικαίωμα να τροποποιήσει ή/και επικαιροποιήσει την παρούσα Δήλωση Περί Απορρήτου at any time, whenever deemed necessary.

## **13. Contact details**

The data subjects who the present Privacy Notice concerns, may contact the company for possible questions, comments or complaints with respect to the present Privacy Notice and/or regarding the general Data Protection Policy of the company, to exercise any of the above rights, to submit a relevant request or to request access to and / or correction of their personal data.

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### **Data Protection Officer (DPO)**

Emmanouil Terezakis, Attorney at Law, DPO WIN MEDICA S.A.

Email: [dpo.winmedica@winmedica.gr](mailto:dpo.winmedica@winmedica.gr)