

## **GDPR & Personal Data Protection Policy**

## Main Terms & Definitions

**Personal Data** is any data concerning an identified or identifiable natural person.

**Data Subject** is the natural person to which the Personal Data refers and whose identity is known or may be confirmed, directly or indirectly, by reference to an identity card number or to factors specific to that person's physical, physiological, mental, economic, cultural, political or social identity.

**Consent of the Data Subject** means any freely given, specific, informed and unambiguous statement/acceptance by the Data Subject by which he/she agrees to the processing of his/her Personal Data by SIGNET.

**Data Controller** is the natural or legal person, public authority, an agency or any other body either, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

**Data Processor** is a natural or legal person, agency or other body which processes Personal Data on behalf of the Data Controller.

**Processing** means any process or set of operations which is executed on Personal Data or on sets of Personal Data, whether or not by automated means.

Such operations are the 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 of Personal Data.

## 1. **The Aim of the Policy**

- The aim of the current Personal Data Protection Policy is that SIGNET will follow and fulfil the provisions of the GDPR and adopt procedures in relation to the collection, processing and use of Personal Data by all data subjects.
- SIGNET is required to follow the provisions of General Data Protection Regulation (GDPR) 2016/679 and any national legislation, as amended from time to time, on the protection of natural persons in relation on the processing of Personal Data and on the free movement of such Data.
- SIGNET is responsible for data protection which is part of the Signet Code of Conduct. **SIGNET partners, managers, tenderers, contractors, associates, employees, customers must comply with the current General Data Protection Policy.**
- **Therefore, SIGNET certifies that all the above categories comply with the present General Data Protection Policy.**

## 2. **What is the meaning of Personal Data?**

**Personal Data** means any information/data relating to an identified or identifiable natural person (a 'Data Subject');

An identifiable person is one who may identify, either directly or indirectly, in particular by reference to the full name, an identification number, passport number, social insurance number, address or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

## 3. **Who needs to provide Personal Data?**

Natural persons, including but not limited to employees, customers, tenderers, contractors, associates, job candidates and health fund members may need to provide their Personal Data. SIGNET may therefore collect and processes the required Personal Data for lawful purposes.

Under the present Policy, the processing of Personal Data does not affect legal persons such as companies, organizations, associations, institutions, government services and other legal entities.

## 4. **Why does SIGNET accumulate Personal Data?**

SIGNET must accumulate Personal Data for all the below categories of natural persons for the following purposes:

- a. **From customers**, to provide services.
- b. **From tenderers**, to evaluate their tenders.
- c. **From contractors and associates**, to accomplish the objective of the collaboration.
- d. **From employees**, to reach the goal of their employment.
- e. **From recruitment candidates**, to examine their job application.
- f. **From company officers**, to fulfill company and regulatory requirements.

## 5. **What Personal Data does SIGNET need to accumulate?**

The following Personal Data is accumulated by SIGNET, depending on the category:

1. **For Customers:** Full name, identity card number and/or passport number and/or alien registration number, telephone number, postal address, e-mail address and residential address, previous positions held.

When using the website or company Wi-Fi network:

- SIGNET systems have the ability to record data such as the browser, operating system and IP address.
- With consent granted via email, SIGNET may gain access to the user's precise geographical location.

2. **For Tenderers:** Name and surname, identity card number and/or passport number, telephone number, fax number, postal address, e-mail address, VAT number, curriculum vitae, IBAN number document for the purpose of a payment through bank transfer.
3. **For Contractors and Associates:** Name and surname, identity card number and/or passport number, telephone number, fax number, postal address, e-mail address, VAT number, Curriculum Vitae, financial statements, IBAN number document for the purpose of payment through bank transfer.
4. **For Recruitment candidates and Personnel:** Name and surname, identity card number and/or passport number, social insurance number, date of birth, telephone number, postal address, residential address, e-mail address, copies of academic and professional qualifications, payroll data, data related to personnel applications, authorizations for deductions and payments, IBAN document for payment through bank transfer.

## 6. How does SIGNET collect Personal Data?

SIGNET collects Personal Data from all data subjects, either directly, through their authorized representatives, or by transferring Personal Data from a competent authority in one of the following ways:

1. In a letter or on a printed application form, sent or handed to our office.
2. Verbally at our office or from time to time through telephone communication to our office.
3. By online automated means (e-mail, website, cookies, Wi-Fi, SIGNET software applications, video recordings and other means).

## 7. How does SIGNET process accumulated Personal Data?

SIGNET processes accumulated Personal Data in the following ways:

- a. as may be required for the execution of a business contract or to take all necessary steps or activities after an application is filled before a contract is created;
- b. as may be required to comply with relevant Law, including MiFID II, and to the extent required to protect its lawful interests,
- c. where acquired through explicit consent through a Personal Data Consent Form.

## 8. How long does SIGNET keep Personal Data?

SIGNET keeps Personal Data as long as is necessary to provide services and/or to fulfil other legitimate purposes as set out in this policy. Furthermore, SIGNET keeps Personal Data as maybe required by other financial regulations such as MiFID II, which mandates that Data should be kept

for 5-7 years after the termination of the client account, specifically:

Provided there are no court proceedings in progress, for work/tenders/offers where a contract was not concluded, the data is deleted within 1 year. These include:

1. Tender documents
2. Contracts, with the goal of collaboration
3. Rejected applications for recruitment
4. Any written offer for the provision services or goods

Provided there are no court proceedings in progress, for work/projects/clients where a contract was concluded, the data is deleted within 7 years after completion of the work. These include:

5. Client contracts, vendor contracts, employee contracts, associate contracts and contracts for the provision of services and goods.
6. Final decision by SIGNET to terminate a contract (client, employee, associate or provision of services and goods).

Provided there are no court proceedings in progress, for information collected through website, Wi-Fi, cookies, IP address etc. data is deleted within 2 years after they entered the system.

Provided there are no court proceedings in progress, video recordings kept for security purposes is deleted 6 months from the recording date.

In all the cases above, in the event of court proceedings, data is deleted 3 years after the completion of the proceeding provided its normal retention period has not expired.

Longer retention periods may be appropriate where SIGNET considers, for example, specific legal or public interest reasons may apply. In that case data will be anonymized.

## **9. How does SIGNET protect your Personal Data?**

SIGNET takes all appropriate steps and measures, either technical, administrative or organizational, in order to comply fully with the provisions of the GDPR Regulation 2016/679 and any other applicable laws. At the same time, SIGNET takes all reasonable measures for the protection of Personal Data from possible accidental or unlawful damage, alteration, loss, unlawful distribution, access or any other possible unlawful processing.

Personal Data, either in electronic form or documents which are no longer required according to the retention periods, are destroyed irrevocably.

Personal Data, both in electronic form and documents, are stored securely and protected further by way of suitable access controls.

## 10. To whom may SIGNET reveal your Personal Data?

SIGNET may reveal your Personal Data in the following instances:

- We may share your data to any natural person or company or other entity delegated by SIGNET to execute on its behalf the processing of Personal Data;
- We may share your data to any natural person or company or public authority, or any other entity, if required by Law or after court decision or after a decision by a competent authority;
- We may share your data with third parties such as contractors and associates we engage or appoint to assist in providing our services;

SIGNET will not reveal, disclose or publish Personal Data to any other parties, except in the above cases, without informing the Data Subject in advance, and, if so required, to obtain his consent.

## 11. What are the Data Subject's rights?

GDPR provides many rights to the Data Subjects and the Data Controller of SIGNET is responsible of informing the Data Subjects of their rights. These include:

- **Information (Article 12 transparency and modalities):** The Data Subject has the right to concise, transparent, intelligible and easily accessible information using clear and plain language without undue delay and within 1 month of receipt of a request for such information, unless, due to complexity, the period is extended by a further 2 months. The information is provided in writing or electronically or by other means, free of charge, unless requests are clearly unfounded or excessive, in particular because of their repetitive character, when SIGNET may either:
  - a) Charge a reasonable fee, considering the administrative costs of providing the information or communication or taking the action requested, or
  - b) Refuse to act on the request.
- **Information during the process of obtaining consent (Articles 13 & 14):** SIGNET informs the Data Subject during the process of collecting his/her data, the purpose of collecting his/her Personal Data, the period for which the Personal Data will be stored, his/her rights, the categories of Data and the source of any Data that has not been collected by SIGNET.
- **Access to Data (Article 15):** The Data Subject has the right to obtain a copy of his/her Personal Data and to be fully informed about the Data, the purposes of the processing, the categories of Personal Data, the storage period and the criteria used to determine that period, the recipients to whom the Data has been disclosed and the source of any Data that has not been collected by SIGNET.
- **Rectification/Amendment (Article 16):** The Data Subject has the right to rectify or complete any incomplete Personal Data and his/her request must be satisfied without undue delay.
- **Right to Erasure "Right to be forgotten" (Article 17):** The Data Subject has the right to request the erasure of his/her Personal Data without undue delay, unless the Data Controller has any legitimate interest.
- **Right to Restriction of Processing (Article 18):** The Data Subject may restrict the processing when he/she questions the accuracy of the Personal Data or the processing is unlawful or is no longer needed.

- **Right to Notification (Article 19):** The Data Controller must communicate any rectification or erasure of Personal Data or restriction of processing to SIGNET recipient to whom the Personal Data has been disclosed and inform the Data Subject accordingly.
- **Right to Data Portability (Article 20):** The Data Subject has the right to receive his/her Personal Data in paper/digital form (whichever the data is available in) and he may transmit it to another organization or request that is directly transmitted to another organization.
- **Right to Object (Article 21):** The data subject has the right to object at any time to the processing of his/her data. In such a case, the processing stops immediately after such an objection, unless the Data Controller has a lawful interest.
- **Right to Non-Automated Individual Decision-Making (Article 22):** The Data Subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or significantly affects him/her.

The Data Subject always has the right to submit a complaint to the Commissioner for Personal Data Protection in case he/she believes that any of his/her rights have been infringed.

The Data Subject furthermore, has the right to withdraw his/her consent at any time.

If a Data Subject withdraws his/her consent, this does not affect the legality of the processing which was based on it prior to withdrawal. If the Data Controller has a legitimate interest in keeping the Data Subject's Personal Data, his/her request to withdraw consent and have the data deleted may be denied.

## 12. How does SIGNET treat breaches of Personal Data?

The Commissioner for Personal Data Protection will be notified within 72 hours for any leak and/or violations of being made. Furthermore, SIGNET will notify the Data Subject (natural person) when there is a high risk of violation of his/her rights and freedoms.

## 13. Who is the Data Controller and Data Processor?

The Data Controller is "SIGNET". The Data Processor is any natural or legal person that processes Personal Data on behalf of SIGNET.

## 14. Who is SIGNET's Data Protection Officer?

SIGNET has appointed a Data Protection Officer (DPO). If you have any questions about this Policy, how we process your Personal Data, or wish to exercise any rights under GDPR, you may contact us. The DPO contact details are available on the SIGNET website. You may also contact him at the following address:

**Signet Data Protection Officer**  
 e-mail: [dpo@fff-am.com](mailto:dpo@fff-am.com)

15. **Amendments to the Personal Data Protection Policy**

From time to time, SIGNET may update or amend the present Personal Data Protection Policy whenever it deems necessary to do so. We will publish the new version on the website and, where appropriate, we will provide a copy of this. Please visit our website regularly.