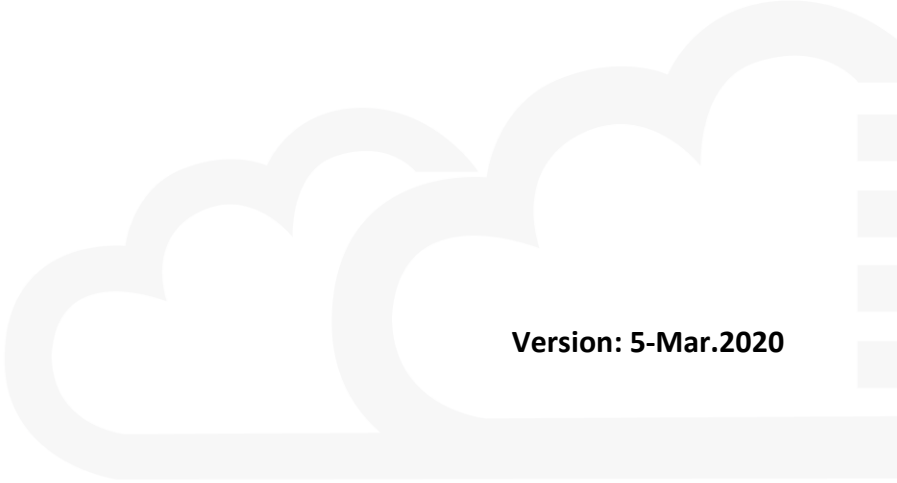


## **PUBLIC POLICY**

**for the protection of Personal Data**



**Version: 5-Mar.2020**



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## Introduction

Regulation 679/2016 of the EU lays down rules on the protection of individuals with regard to the processing of personal data and rules on the free movement of personal data. It also protects the fundamental rights and freedoms of natural persons, and in particular their right to the protection of personal data.

Subjects of Personal Data are natural persons in the country and abroad who come in contact and relate to LANCOM for various reasons.

This document is a controlled document of LANCOM Ltd. with its policy regarding the protection of personal data in the context of the application of the relevant regulation 679/2016.

## Definitions of Key Terms

For the purpose of the implementation of the Regulation 679/2016, the following key terms and definitions are used, according to article 4:

(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;

(2) 'processing' means 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;

(7) 'controller' means 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 Union or Member State law;

(8) 'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

(11) 'consent' of the data subject means 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;

For more terms and definition, please look at Article 4 of the Regulation 679/2016.

## 1. Data Protection Officer

LANCOM, in application of Regulation 679/2016, has appointed a Data Protection Officer by decision of its Management, who has all responsibilities set out in this Regulation 679/2017. Contact e-mail address: [gdpr@lancom.gr](mailto:gdpr@lancom.gr)

## 2. Basic Principles for the Collection and the Processing of Personal Data

### 2.1. Collection of Personal Data

The collection of personal data takes place in accordance with established principles in Article 5 of Regulation 679/2016. In particular, Personal Data (PD):

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');

(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');

(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

## 2.2. Processing of Personal Data

### 2.2.1. Basic Requirements

It is the obligation and commitment of LANCOM to consistently apply at least one of the following conditions, in accordance with Article 6 of Regulation 679/2016, when processing Personal Data:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- (b) 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;
- (c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- (d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

### 2.2.2. Consent of the Subject

Consent to the processing of Personal Data by their Subject is not required for data relating to and required to carry out legal actions, such as, for example, recruitment, staffing, sick leave, contract or contract, invoicing, withholding tax. Consent is normally required for data that does not arise from required legal procedures.

LANCOM Ltd. collects & processes Personal Data solely for legitimate purposes in accordance to Article 6 of Regulation 679/2016.

### 3. Actions of LANCOM in Collection & Processing of Personal Data

Collection and processing of Personal Data by LANCOM is conducted according to the relevant articles 5 & 6 of the directive 679/2016 (GDPR).

### 4. Rights of Subjects of Personal Data

#### 4.1. Types of Rights

The Subjects according to Articles 12-23 of Regulation 679/2016, have rights to:

- 1) Have access to the PD
- 2) Rectification of PD
- 3) Erasure of PD ('right to be forgotten')
- 4) Restriction of PD processing
- 5) Portability of their PD
- 6) Object and be excluded from automated individual decision-making, including profiling in automated individual decision-making

#### 4.2. Use of Rights by Subjects of Personal Data

LANCOM takes appropriate measures to provide any information related with the rights of Subjects of PD, according to the specific Articles of the Regulation 679/2016. In this respect, these subjects such as suppliers, customers, affiliates, etc., can make use of the above rights by submitting relevant requests to LANCOM in appropriate standard forms, which are available [HERE](#).

### 5. Security of Personal Data Processing

#### 5.1. Information Security Management System

LANCOM applies an information security management system (ISMS), in accordance with ISO 27001 and ISO 27017 standards, certified by an Accredited Certification Body. This system covers all functions and activities of LANCOM.

#### 5.2. Purpose of the Information Security Management System

The main purpose and object of LANCOM's information security management system is the protection and security of information regarding:

- 1) The integrity, i.e. the prevention of any alteration, loss or destruction
- 2) The confidentiality, i.e. the prevention of any leakage to unauthorized persons
- 3) The availability, i.e. the ability to use and access information, whenever required, without any kind of problems and difficulties

#### 5.3. Security & Protection of Personal Data

Personal Data of Subjects makes a subgroup of information assets managed by LANCOM's information security management system.

#### 5.4. Information Protection & Security Measures

LANCOM, in the context of information security and in particular the protection of personal data, implements specific organizational and technical measures. In particular it applies:

- 1) Organizational measures in the form of procedures, authorizations and distribution of roles

- 2) Physical security measures against natural and environmental hazards & threats
- 3) Security measures for logical access to Information & Communication Systems, which process information, including PD
- 4) Internal and external communication security measures
- 5) Measures for backups, use of mobile devices & systems, facing malware, handling installation & changes of software and process changes
- 6) Security measures for the supplies of materials, products and services
- 7) Encryption of data and sensitive information

#### 5.5. Risk Management in the Processing of Personal Data

In the context of implementing the information security management system, LANCOM implements appropriate risk management methodologies in application of relevant standards requirements and legislation, including:

- 1) Identification and risk analysis
- 2) Risk assessment
- 3) Risk management
- 4) Monitoring, reviewing and controlling the performance of the information security management system.

It is noted that in the context of risk management, a risk assessment of the basic objectives concerning the protection and security of information, and in particular of personal data, regarding integrity, confidentiality and availability is carried out.

When identifying, analyzing and assessing risks, account is taken of any form of data, including incident records, technical inspection results and vulnerability assessments

#### 6. Notification and communication of a personal data breach

LANCOM applies well defined procedures to identify and record events that compromise the confidentiality of PD. In particular, for Personal Data breach, immediate notification to the Data Protection Authority is provided in accordance with Regulation 679/2016.

In addition, LANCOM, when the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, communicate the personal data breach to the data subject without undue delay.

#### 7. Information, Awareness - Evaluation & Review

The continuous updating and awareness raising of the personnel of LANCOM on the protection of personal data is part of the training and briefing.

LANCOM takes care of evaluating and reviewing the performance of its processes, policies and measures to protect personal data in order to continually improve its protection and security.

In particular, with regard to information security, including Personal Data, LANCOM sets specific targets - quantitative as far as possible - concerning levels of risk and their reduction through the implementation of well defined risk treatment actions.