

# PRIVACY STATEMENT

## FOR THE PROTECTION OF PERSONAL DATA

### 1. INTRODUCTION

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ADACOM's mission is to enable security online while preserving business continuity. Among the most important aspects of our mission is our commitment to provide a safe environment for your personal data and keep you updated on the personal data we collect about you and the way we use and protect it.

### 2. DATA COLLECTION

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In Adacom we know of, and we are extremely thorough, regarding our customers' and other web site visitors' interest in the protection of their personal data. If you are either one of our customers for any of our products or services, or simply a visitor of our website, we assure you that we do not collect your personal information, unless you provide us with it on your own initiative, when filling in the relevant form. This information may include:

- Contact details, such as name, postal address, email address and telephone number etc.;
- Shipping and billing information, including credit/debit card and payment information;
- Information you provide to us to receive technical assistance or during customer service interactions;
- Information you submit in our online application form when applying for a job vacancy.

#### **In case you apply for a Trust Service Certificate:**

As a Trust Service Provider, ADACOM collects personal information, in order to issue your Certificate, depending on the type of Certificate you apply for. This personal information may include your name, surname, identity document details, email address, postal address, telephone number, credit/debit card information and/or other personal details, as necessary.

If you choose ADACOM's Remote Identity Proofing as a method of verifying your identity before the issuance of your Certificate, you will be asked to provide your explicit and special consent regarding the collection, recording and retention of all data and files required, including a snapshot of your identity document, an image of your face and/or the video recording of your session and/or your dynamic selfie, as the case may be.

### 3. PURPOSE AND USE OF PERSONAL DATA

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Your information, whether public or private, will not be exchanged, transferred outside our company and its subsidiaries, or given to any other company for any reason without your consent and will not be used for any other than the purposes specified below:

- Process applications for ADACOM products and services
- Process your purchase order

- Provide you with technical and customer support
- Issue, revoke and process Certificates according to our [Certification Practices Statement \(CPS\)](#)
- Verify your identity to issue a Certificate to you
- Create and manage your ADACOM Account when you purchase from our e-shop
- Subscribe you to a newsletter,
- Solicit your opinion or feedback
- Allow interoperability within our applications
- Enforce our legal rights or comply with legal requirements
- Evaluate your CV and communicate with you, when you send us your CV via email or apply for a job via our online application form.

### **Marketing**

In addition to the purposes described above, we may, in compliance with applicable consent requirements, use your information to contact you for products/services promotion purposes. We may contact you by email, phone or mail.

You can always opt out at any time by unsubscribing from marketing activities.

### **Statistical Purposes**

If you do not want us to use your information in this way, you can simply choose not to give your permission on the webpages and/or forms with which we collect your information.

## **4. PERSONAL DATA TRANSFER**

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The transfer of personal data as described under this Privacy Statement does not include transfers of personal data to countries outside the European Economic Area (EEA). If, for any reason, we need to transfer personal data to countries outside the European Economic Area, we will do so only with appropriate consent requirements and only to recipients who provide adequate data protection safeguards and, in any case, in accordance with the provisions of articles 44-49 of Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR).

### **Data Processor**

If you choose ADACOM's Remote Identity Proofing as a method of verifying your identity before the issuance of your Certificate, your personal data will be collected and processed by Electronic Identification S.L. (Spain) with which ADACOM maintains a contractual relationship complying with the GDPR for the safeguarding of your personal data. Your personal data will then be transferred securely to ADACOM which is responsible for their retention according to paragraph 6 below.

## **5. COOKIES**

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ADACOM may also collect information about you automatically when you visit our websites by using cookies. A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to tailor their operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

For more information about cookies, including how you may opt out please refer to our [Cookie Policy](#).

## 6. DATA RETENTION

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### **In case of Trust Service Certificates:**

ADACOM, as a Trust Service Provider, collects, processes and stores the Subscriber's personal data exclusively for the purpose of ID verification and the issuance of the qualified certificate. The personal data is stored in an electronic record, which is protected with all necessary technical and organizational measures and is accessible only by specially authorized personnel. ADACOM will retain your personal data for a period of at least seven (7) years from the date of expiry or revocation of your Certificate, in accordance with the eIDAS regulation (Regulation EU no. 910/2014) and national regulatory requirements. If no qualified certificate is issued eventually, the retention period of the above record is two (2) years.

In case of remote ID verification, if the video call is not completed for any reason, no personal data of the Subscriber will be recorded by ADACOM.

### **In case you apply for a job vacancy:**

When you apply for a position in our Company, we will retain your personal data for a period of twelve (12) months.

### **Projects execution and Services provision**

Personal data might be processed during the provision of our services and will be erased within a reasonable time after the project's completion or after the delivery of the services, unless otherwise agreed in the relevant contractual arrangement, or a longer retention period is required or permitted by law.

## 7. DATA SUBJECT RIGHTS

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ADACOM makes it easy for you to manage your personal data and exercise your rights, in compliance with the applicable national and European legislation.

You may submit a request, by sending us an email to [dpo@adacom.com](mailto:dpo@adacom.com) or mailing ADACOM at the address listed in this Statement, in order to:

- Confirm whether we hold any of your personal data
- Have access to your personal data or verify its accuracy
- Correct and update your record with personal data, in case it is inaccurate
- Request the erasure of your data or request the cessation of its processing provided that there are no legitimate grounds for retaining it.

ADACOM will respond within 30 days after validating your request. If for some reason we deny to satisfy your request, we will provide you with a detailed explanation.

## 8. LEGAL DISCLOSURES

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We may disclose information when required by law or when disclosure is necessary to protect ADACOM's rights and/or comply with a court order, regulatory obligation, bankruptcy proceedings, or similar legal process.

## 9. SECURITY

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ADACOM implements all the appropriate technical and organizational measures in order to ensure the protection of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure. We store the personal information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. For example, we encrypt all the data you submit when ordering our products or services, using the Secure Sockets Layer (SSL) Protocol. At the same time, the information security procedures are audited on an annual basis by an internationally recognized auditing firm.

## 10. LINK TO OTHER WEBSITES

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Our website may contain links to other websites of interest. However, once you have used these links and left our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Statement. You should exercise caution and read the privacy statement applicable to the website in question.

## 11. CHILDREN'S PRIVACY

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Adacom is committed to protecting the children's privacy. Our site is not directed to, nor do we knowingly collect information from children under the age of 18 years old. In the event that we find out that we have collected personal information from a child without verified parental consent, we will delete it as quickly as possible.

## 12. COMPLIANCE WITH DATA PROTECTION LAWS

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ADACOM declares to fully respect all rights and obligations established and laid out in the Greek and European Legislation regarding the personal data protection and operates within the limits of:

- All the relevant Data Protection and Privacy Laws, as well as any other regulatory requirement is subject to,
- Any guidance or statutory code of practice issued by Data Protection Authority,
- The provisions of ADACOM's Certification Practices Statement (CPS)
- The provisions of this Privacy Statement.

## 13. CHANGES TO THIS PRIVACY STATEMENT

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ADACOM may modify this Privacy Statement and related practices at any time. We encourage you to periodically review this page for the latest information on our privacy practices. This Privacy Statement was last updated on 15<sup>th</sup> March 2022.

## 14. CONTACT DETAILS

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ADACOM S.A. is the Controller of your personal data within the meaning of Regulation (EU) 2016/679 (GDPR).

The following options are available if you wish to contact us, submit a complaint or manage your account information:

- You may send mail us at the following address: 25 Kreontos str., 104 42 Athens-Greece.
- You may call us at: +30 210 5193740
- You may send email to: [dpo@adacom.com](mailto:dpo@adacom.com)
- Visit our website: [www.adacom.com](http://www.adacom.com)