

Privacy Policy MSTAT

1. Introduction

MSTAT S.A. ("Company") is a provider of value-added telecommunication services based in Athens, Greece. We respect your privacy and are committed to protecting the personal data you entrust to us. This Privacy Policy explains how we collect, use, and protect your personal data, as well as your rights under the General Data Protection Regulation (GDPR) and applicable Greek data protection law.

2. What Data We Collect

We only collect personal data that is necessary for the purposes for which it is processed. The personal data we may collect includes:

- **Contact details:** Name, surname, email address, telephone number, and other contact information that you provide to us (e.g. when you fill out our contact form or reach out to us for a quote or collaboration).
- **Account/partnership information:** If you become our customer or partner, we may collect information such as your company name, job title/role, billing address, and other information necessary for entering into and fulfilling a contract.
- **Communication content:** Any information you include in your messages to us (e.g. the content of your inquiry, requests, or comments) when you contact us via the website, email, or phone.
- **Newsletter subscription data:** If you subscribe to our newsletter, we collect your email address and may record technical details like your IP address and the time of subscription for purposes of consent verification.
- **Browsing data and cookies:** When you visit our website, we collect technical information such as your IP address, browser type, operating system, pages visited, as well as cookies



(small text files) that are stored on your device. More information about cookies is provided in the **Cookies** section below.

We do not intentionally collect any special categories of sensitive personal data (such as data about health, political opinions, etc.) through our website. Moreover, we strive to collect only the minimum personal information necessary, limiting processing to what is relevant and adequate for the stated purposes.

3. How We Use the Data

We use the personal data we collect exclusively for legitimate business purposes, specifically:

- **Providing services and performing contracts:** We use your information to respond to your requests and provide you with the services or information you have asked for. For example, if you request a quote or initiate a collaboration with us, we will process your data to prepare and execute the relevant agreement, and to generally manage our business relationship.
- **Communication and support:** We process your contact information to reply when you contact us, to address inquiries or complaints, and to provide customer support.
- **Newsletter and promotional communication:** With your consent, we use your email to send you newsletters and informational communications about our news, products, or services. You can withdraw your consent at any time and choose not to receive such communications going forward (see the right to withdraw consent in the Rights section below).
- **Improving our website and services:** We analyze usage data and cookies to understand how visitors use our website, to identify any navigation issues, and to improve the functionality, structure, and content of the site. This helps us enhance user experience and tailor our services to user needs.
- **Security and fraud prevention:** We may use IP addresses and other technical data



to protect our website and systems from malicious activities, unauthorized access, or other

security threats. These data may be used to detect, investigate, and prevent security incidents or abuses of our services.

- **Legal compliance:** In certain cases, we process your data to comply with legal obligations, such as tax and accounting requirements, or to respond to lawful requests from public authorities.

We do not use your personal data for purposes other than those described in this policy, unless we obtain your prior consent or are otherwise permitted or required by law. Furthermore, we do not engage in automated decision-making or profiling based on your personal data.

4. Legal Basis for Processing

We process your personal data only when there is a valid legal basis under Article 6 of the GDPR. Depending on the context, processing may be based on one or more of the following legal grounds:

- **Performance of a contract or pre-contractual steps:** When processing is necessary for the conclusion, execution, or management of a contract with you, or for actions taken at your request prior to entering into a contract. For example, when you request information or a quote for our services, or when you engage with us as a client, we process your data to fulfill these obligations.
- **Consent:** Where you have provided your explicit consent, such as for receiving our newsletter or for the use of non-essential cookies (e.g. analytics cookies). In such cases, you have the right to withdraw your consent at any time (without affecting the lawfulness of processing prior to withdrawal) by contacting us or using the provided mechanisms (e.g. the unsubscribe link in a newsletter email).
- **Legal obligation:** When processing is necessary for compliance with a legal obligation to which the Company is subject, e.g. maintaining tax records, responding to a court or administrative order, or retaining data as required by law.

- **Legitimate interest:** In certain cases, we may process your data for purposes of our legitimate interests, provided that such processing does not override your rights and freedoms. For example, processing certain browsing and log data for network security and fraud prevention is based on the Company's legitimate interest in protecting its business and services.

5. Data Sharing

MSTAT does not sell, rent, or trade your personal data to third parties for their own independent commercial purposes. However, we may share your data with trusted third parties under specific circumstances and with appropriate safeguards:

- **Authorized personnel and service providers:** Your data is accessible only by our authorized personnel who need to access it and who are bound by confidentiality obligations. In addition, we may engage external partners or service providers (processors) to assist in our business operations (e.g. providers of data hosting, technical support, email distribution services). In such cases, these parties will process your data solely on our behalf and according to our instructions, and they are contractually obligated to protect your information and use it confidentially.
- **Legal and regulatory authorities:** If required by law or pursuant to a valid request from a competent authority (e.g. a court order or law enforcement request), the Company may disclose the necessary data to such authorities. In each case, we will ensure that any disclosure is conducted through the proper legal procedure and only to the extent necessary to comply with our legal obligations.
- **Corporate transactions:** In the event that MSTAT undergoes a merger, acquisition, or any other business transaction, personal data may be transferred to the acquiring or successor organization, provided that it continues to be used for the same purposes and with due respect for the applicable data protection laws.

MSTAT does not transfer your personal data outside the European Economic Area (EEA). If in the future it becomes necessary to transfer data outside the EEA, we will ensure that appropriate safeguards are in place (such as standard contractual clauses approved by the EU or other lawful mechanisms) so that the level of protection for your data remains consistent with EU standards.

6. Your Rights

Under the GDPR, you have certain rights regarding your personal data. We are committed to ensuring that you can exercise these rights easily and we will respond to such requests within the timeframes provided by law. Your rights include:

- **Right of access:** To obtain confirmation of whether we are processing your personal data and, if so, to access those data and receive a copy of the information we hold about you.
- **Right to rectification:** To request correction of inaccurate personal data or the completion of incomplete data we hold about you, so that it is accurate and up to date.
- **Right to erasure** ("right to be forgotten"): To request the deletion of your personal data when it is no longer needed for the purposes for which it was collected, or if you withdraw your consent (where the processing was based on consent), or if the data has been unlawfully processed, or when erasure is necessary to comply with a legal obligation.
- **Right to restriction of processing:** To request that we restrict the processing of your data in certain circumstances – for example, if you contest the accuracy of the data (for the period we need to verify it) or if the processing is unlawful but you prefer restriction instead of deletion.
- **Right to data portability:** To receive the personal data that you have provided to us in a structured, commonly used, machine-readable format, and to request that we transmit those data to another controller where technically feasible. This right

applies when the processing is based on your consent or on a contract and is carried out by automated means.

- **Right to object:** To object, on grounds relating to your particular situation, to the processing of your data that is based on legitimate interest. You also have the right to

object at any time to the processing of your personal data for direct marketing purposes, including any profiling related to direct marketing.

- **Right to withdraw consent:** Where processing is based on your consent, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing that took place prior to the withdrawal, but it means that we will cease processing the relevant data for the purposes you had originally agreed to.
- **Right to lodge a complaint:** If you believe your rights have been violated or that applicable data protection laws have not been respected, you have the right to file a complaint with the competent supervisory authority. In Greece, the responsible authority is the **Hellenic Data Protection Authority** (www.dpa.gr).

To exercise any of the above rights, you can contact us using the information provided in the **Contact** section below. We will make every effort to address your request promptly and within the legal deadlines (generally within one month, with the possibility of an extension of two further months for complex or numerous requests if needed).

7. Retention Period

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable law. Specific criteria that determine the retention period include:

- **Duration of our relationship:** For example, customer data are kept for the duration of the contract and for a reasonable period after its termination, in order to fulfill any obligations or address any issues arising from the contractual relationship.
- **Purpose of collection:** Data collected for a specific purpose is deleted or anonymized once that purpose has been achieved. For instance, if you provide your details to receive a quote but ultimately no contract is concluded, we will retain your information only for as long as needed to complete our communication and any



follow-up actions, and then we will delete it.

- **Consent/Newsletter:** If we process your data based on consent (e.g. for sending newsletters), we will retain it until you withdraw your consent or until the purpose for which it was collected is no longer applicable. In case of consent withdrawal, we will delete or anonymize the related data promptly and securely.
- **Legal obligations and legitimate interests:** In some cases, we are obliged by law to keep data for a certain period (e.g. tax or accounting records). We may also retain certain data for a longer period if required for the establishment, exercise, or defense of legal claims (e.g. keeping contract information in case of disputes, in line with the statute of limitations).

After the applicable retention period has elapsed, we will ensure that your personal data is securely deleted or irreversibly anonymized so that it can no longer be associated with you.

8. Cookies

Our website uses cookies to enhance the browsing experience and the services we provide. Below is information about the cookies we use and how you can manage them:

- **What are cookies:** Cookies are small text files that are stored in your browser when you visit a website. These files contain information that is often used to recognize you as a user and maintain certain preferences or settings during your browsing. Cookies can be removed by you at any time through your browser settings.
- **Absolutely necessary cookies:** These cookies are essential for the proper functioning of our website. They enable you to navigate the site and use its basic features (such as accessing secure areas). Without these cookies, the website cannot operate effectively.
- **Analytics/targeting cookies:** We use analytics tools, such as Google Analytics, for statistical purposes. These cookies help us understand how visitors interact with our site (e.g. which pages are visited, how long users stay) and thereby improve our content and services. Note that through Google Analytics, Google may collect



information about your use of our site and use it to provide personalized advertisements on other websites. The

data collected through analytics cookies are aggregated and are not intended to directly identify you.

- **Managing cookies:** You can control and delete cookies at any time through your browser settings. You have the option to delete all cookies that have been stored on your device, or to configure your browser to refuse new cookies. Please note that rejecting certain cookies may affect the functionality of our website. Below are links to instructions on how to delete cookies in the most popular browsers:

- **Google Chrome**
- **Mozilla Firefox**
- **Apple Safari**
- **Microsoft Internet Explorer/Edge**

If you continue to use our website without disabling or rejecting optional cookies, we will assume that you consent to our use of such cookies as described above (where such consent is required by law).

9. Contact

If you have any questions, requests, or concerns regarding this Privacy Policy or the handling of your personal data by MSTAT, please contact us using the information below:

- **Company:** MSTAT S.A. Software & Communications Provision & Production
- **Address:** 6 Sinopis Street, 11527 Athens, Greece
- **Telephone:** +30 210 3389590
- **Email:** info@m-stat.gr

MSTAT has appointed a Data Protection Officer (DPO) to oversee compliance with privacy regulations. For matters related to your personal data, you may reach out to our DPO via the above email address.

We will make every effort to respond to your inquiries or requests as quickly as possible.



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