

PERSONAL DATA

POLICY

This site www.smartpark.com.gr (hereinafter referred to as the "Website") has been created by the company "YIALOU EMPORIKI AND TOURISTIKI S.A." (hereinafter referred to as "the Company"), which is a subsidiary of the company "REDS REAL ESTATE DEVELOPMENT AND SERVICES SOCIETE ANONYME", which owns and operates the Shopping Center "Smart Park" (hereinafter referred to as the "Shopping Center"). This website aims to provide information and services for the visitors/users of the Site (hereinafter the "Users"). The Company is the Data Controller of your personal data, which it receives through the use of the Website in accordance with General Data Protection Regulation 2016/679 (hereafter referred to as "GDPR") as well as under the no. 4624/2019 greek law, as it applies.

This Personal Data Policy (hereafter the "Policy") explains what kind of data is collected by the Company and how the Company uses that data, including data from your visit to this Site. This Policy includes a description of your privacy rights and also explains what kind of personal information we collect through the site, and how this data is handled.

Also in this Policy there is additional information specific to personal information collected and recorded by the Company each time you use the WiFi Service provided by us (the "WiFi Notice»).

Types of personal data and purpose of processing

Personal data is that information relating to a person whose identity is or may be known. The personal data that can be collected while browsing the Site is the following:

(a) data provided by you, the data subjects, through the Site, e.g. name, address, phone numbers, email addresses, when communicating via our contact form via the Website, when you subscribe to our newsletter to be informed about our latest news, events and offers when you register for competitions or complete surveys,

b) data you provide to us for direct advertising,

c) data about your computer, your visits, and your use of the Site, such as your IP addresses, the date and time of your visit to the Website, the type of web browser, and your operating system, the source that referred you to the Site, the length of your visit, the pages you viewed, and the course of your web browsing,

(d) data contained in or relating to any communication you may have with us either directly or through our Site (including the content of communication and metadata relating to communication),

e) data such as those specified in the " Cookies" section below,

f) data we collect through transactions and offline interaction. These include information you provide when you buy gift cards, completing surveys, signing up for competitions, and

g) data described in the "WiFiNotice".

The Company processes the data of the Users of the Website for the following explicit reasons, subject to their explicit consent:

- In order to administer the Site, the newsletter, to manage or run competitions or offers,
- In order to respond to your enquiries, complaints or requests for additional information and to contact you regarding the Website and the Shopping Center,
- For statistical purposes, to research how our Site and the products of the Shopping Center are used, understand how we can improve the Site, our products and services,
- In order to maintain the security of the Website and/or of the Shopping Center,
- In order to meet the requirements of the law, public authorities and compliance regulations or to establish, exercise or defend legal claims, if required,
- In order to protect the rights, the property or the safety of the Company, the Shopping Center and our customers,
- For the purposes described in the WiFi Notice.

Also, we will inform you regularly about other products and/or services that we offer via email/text message (SMS)/phone call, where permitted by applicable law, which it may require acquiring your consent. In addition to your ability to unsubscribe from these forms of communication, you can email us at smartparkcomgr@gmail.com any time to declare that you do not wish us to communicate with you for direct promotions.

In cases where we process personal information based on your consent, this consent may be revoked at any time. If you are under the age of 16, consent should be given or approved by the person who has your parental responsibility.

Transferring your personal data

The Company may forward your personal data to third party e.g. service providers who perform functions on our behalf on the Site and the purposes described in this Policy (eg web hosting, social network analysis service providers, marketing service providers through email, web designers), or to partners or other companies with whom we cooperate and to the extent that this is necessary for the operation of the Site and the realization of the purpose of the processing. In this case, the Company will take all necessary steps to ensure that its affiliates are specifically authorized to do so and are fully bound by the confidentiality and obligations of the law on the collection and processing of personal data.

In addition, your data may be transferred to public authorities and other third parties when required by applicable law, including among others our compliance with a court ruling.

Cookies

The Company may collect information of the Users of the Site, using similar technologies, such as cookies and / or tracking Internet Protocol address (IP).

Cookies are small text files stored on each user 's hard disk and do not obtain any knowledge of any document or file from their computer and are used to facilitate User access to the use of specific services and / or Site pages for statistical purposes and in order to determine which areas are useful or popular. The following types of cookies are used on the Site :

(a) the "browser" cookies, which are temporary cookies that remain in the cookies folder in the browser for as long as the user is connected to the Site, and

(b) the "persistent" cookies - these are held longer in the file "cookies" of the browser used by the User (depending on the lifetime of the specific cookie).

Browsing cookies are used to improve browser navigation on the site and to collect aggregate statistical information. This aggregated statistical information is used for internal purposes only by the Company and will not be passed on to third parties.

Persistent cookies are used on the Site to store information on the computer of the user for various purposes, indicative of the retrieval of specific information previously provided by the user (e.g., code details) for defining the areas of the Site that are more interesting to users and the configuration of the site according to the user 's preferences. These data may also include the type of browser used by the user, the type of computer, its operating system, Internet service providers and other information of this kind. Moreover, the information system of the Site automatically collects information about the places visited by the User and about links to third party websites that may be chosen by using the site link. The User may set up his web browser in such a way that he or she warns him or her against the use of cookies in certain services or does not allow the acceptance of the use of cookies in any way. In the event that the user of these services and pages does not wish to use cookies for his / her recognition, he / she may not have access to these services.

The User's computer receives an IP address each time the User is connected to Internet. Through this address the User's computer sends and receives data. In general, each time the User is connected to Internet the IP address is different. However, under specific conditions, (e.g. in broadband connections) the user's IP address becomes permanent. A permanent IP address might identify a User with a certain computer and therefore might process personal data. Web log information is non-personalized information collected by the computer hosting the Website each time a user visits the Website. Examples of types of information collected through IP address include date and time of website visit, the browser type and software type used. The Company or its authorized representatives make use of User's IP address and web log information in order to collect aggregated information about the use of the Website and to improve its operation.

Links and Third Party Products on the Website

The Website may be linked to third party web sites and services that are not controlled by the Company which is not responsible for the security or confidentiality of any information gathered from web sites or other services. If the user decides to use via the links on the site some of the third-party websites, accepts that he does so under his own responsibility.

The Users should monitor and watch the relevant privacy statement applicable to the web sites and third party services that use.

We also provide you with a number of products or services (google maps, embedded documents from issuu.com, search services such as phone, pdf files, etc.) developed by third parties - websites and we are not responsible for these third party products or services.

Part of the content of the Site and the advertisements are provided by third parties that are not related to us. In these cases, we have entered into agreements with these third parties. For example: We give you the ability to watch video content provided by content providers. Some third parties may show ads or monitor which ads users see, how often they see them and how users respond to them.

Your rights

In order to keep this data in accordance with the provisions of the General Data Protection Regulation 2016/679 and the no. 4624/2019 law, the Company shall take all necessary technical and organizational measures for the safe processing of such data and for ensuring an adequate level of data security against risks, e.g. destruction, loss, alteration, unauthorized reading/copying, modification or deletion of personal data, to ensure the confidentiality, integrity, security, availability and reliability of systems and processing services in a continuous base.

The Company does not process the above data for other purposes as well as processes only the personal data necessary for the purpose of the processing, which always takes place lawfully and in accordance with the spirit and the terms of the General Regulation, the no. 4624/2019 law and the effective legislation.

Personal data processed by the Company are lawfully retained for as long as it is necessary for the purpose of processing. Upon expiry of this period (e.g. because you unsubscribed), the data is deleted unless otherwise provided by the applicable legal and regulatory framework or as required to defend the Company's rights before a Court or other competent Authority.

As a data subject, you have, under certain conditions, the right to access your recorded data, as well as the right to receive the above-mentioned data in a structured, commonly used and machine readable format (portability right), the right to correct your

data if it is inaccurate, the right to delete your personal data, unless its observance is mandatory by law, the right to limit the processing, the right to object at all times to the processing of the personal data concerning you, including the processing of the profile setting and, in general, all the rights provided for in Chapter III of the General Regulation.

To exercise your above rights and any other information or questions regarding the processing of your personal data you can contact Mrs. Margarita Skarou (dporeds@etae.com, tel. 210 6635982) who has been appointed as Data Protection Officer for the group of companies "REDS S.A.".

If you exercise any of your above rights, the Company will take every possible action to meet your request within thirty (30) days of receipt, and you will be informed of this. It is stated that this period may be extended for two (2) additional months, taking into account the complexity of your request and the number of requests in general. These rights are exercised at no cost to you, unless they are often repeated and because of their number they have administrative costs for us, so you will incur costs.

Furthermore, our Company will notify you of any violation of your personal data if this violation may put your rights and freedom at high risk, and provided that it does not fall under one of the exceptions the law expressly provides.

You also have the right to have recourse to the Personal Data Protection Authority if you believe that your rights regarding the processing of your personal data are being affected.

Intellectual and Industrial Property rights

All intellectual and industrial property rights of the Site and its contents, including the title, the mark and distinctive feature, images, texts, graphics, logos, chips, works, illustrations, photographs or designs, and any other distinctive elements, could to be used for commercial purposes, are the exclusive property of the Company.

It is strictly forbidden to reproduce, distribute and publish the above items and the contents of the Site by unauthorized persons, in any kind of device or by any technical means without the express permission and written consent of the Company.

The Users of this site accept to fully respect the Company's intellectual and industrial property rights and must use the site for personal use only. Any other use is prohibited and Users will have to request the express and written authorization of the Company.

Amendments to this personal data policy

Since this notice and the personal data protection terms it contains may be amended, data subjects must regularly check the content of this notice for any changes.

WiFi Notice

The WiFi Notice is about using the service of WiFi (hereinafter the "WiFi Service») provided by or for the Company at the premises of the Shopping Center, at the request of the User to access or have already gained access to the WiFi Service. This Notice, which complements the Policy, explains more fully how we use the data we collect when using the WiFi Service. Specifically:

➤ The Company processes the following information about Users:

(a) data provided by Users when registering to the WiFi Service (eg name, address, telephone numbers, e-mail address and date of birth), as well as the communication between Users and the Company related to the WiFi Service.

b) identification of the Users device and the MAC address (a MAC address is a unique identifier of your device, which reveals the manufacturer, but does not reveal the name or the User's phone number and does not give access to the Company to any data stored on your device. If the WiFi is enabled on your mobile device's settings when you visit one of our sites, we will automatically collect the MAC address of your device),

c) the time and place from which the Users are connected to the WiFi Service. This data will be automatically collected by your wireless access point unless your phone or device is switched off or you have turned off WiFi on your phone or device.

➤ In addition to the purposes outlined in the Policy, we use your personal information for the following purposes:

a) To provide the WiFi Service and to allow you to easily connect to the WiFi Service on return visits,

b) In order to respond to your requests for additional information, queries or any complaints about the WiFi Service,

c) To send you information about the WiFi Service, including information about any changes thereto,

d) To monitor the use of WiFi Services in order to prevent, investigate and/or report security violations or crime,

e) To verify compliance with the terms and conditions governing the use of the WiFi Service,

f) For purposes of research and analytics of use of the WiFi Service in order to identify general consumer trends, to understand customer, consumer and social behaviours and to improve our products and services. We probably will provide aggregated statistics about our sales, customers, traffic patterns to third parties for analytics purposes but these statistics will not include any data or information that is likely to identify you as an individual.

We use your MAC addresses to determine your distance from WiFi sensors that are located across the location you are visiting. We are processing this information in order to aggregate reports about visitors' movements on our locations. We use this information, for example, to optimize the layout of our locations, design marketing promotions, change staffing hours, or measure the impact of an advertising campaign. You can always unsubscribe from having your location data collected, by sending an email to smartparkcomgr@gmail.com.

- In addition to the transmission methods described in the Policy, the Company transmits data to third party service providers who perform work on behalf of the Company on WiFi Services and for the purposes described in this Notice and the Policy.

- The data you provide when you subscribe to the WiFi Service, your device information, and your MAC address are retained for two years from the time they are collected.

Your rights

See the relevant section of the Policy.

Amendments to this Notice

The Company reserves the right to amend anytime this Notice. Amendments to this WiFi Notice will be published on the Website or the login or subscription pages of the WiFi Service. The User will have to review the WiFi Notice for any amendments or additions and the Company is under no obligation to inform each User separately about his or her rights.