

PRIVACY POLICY of “DL Automation”

I. INTRODUCTION

1. General

- 1.1. The respect of your privacy and the protection of your personal data is a priority for DL Automation. To make sure that your data is treated according to the law and that you are properly informed about the purposes and ways in which we, the company under the name “**DL AUTOMATION PC**”, having its registered corporate seat in **PIRAUES, P.C.: 18541, with VAT No.: 800521409**, (“Company”, “us”, “our”, “we”), process your personal data, we have adopted the following Privacy Policy (“Privacy Policy”), which is addressed to the users (“Users”, “you”, “your”) of our website www.dlautomation.gr/ (“Website”) and our services.
- 1.2. Below you will find information on the terms under which your data collected through the Website is processed by the Company, including:
 - information about us, the data controller, and the relevant contact details for any issue related to your personal data;
 - the types of personal data we collect, store, disclose and use;
 - the purpose and legal basis for the processing;
 - security measures for the protection and storage of your data and retention policies;
 - recipients of your personal data;
 - your rights and the ways to exercise them.

2. Data Controller & Contact Details

- 2.1. We, the Company under the name DL Automation, are the Data Controller of your personal data.
- 2.2. Contact Details: +30 210 4615201
- 2.3. Questions & inquiries: You may communicate with us using the contact details above and submit any comment, inquiries, observations or any complaints regarding this Privacy Policy and generally the collection and processing of your personal data. For further information on how to handle issues relating to your personal data, please refer to Section III.9.
- 2.4. By visiting the Website, or making use of its services, including providing any of your personal data, you accept this Privacy Policy, under which collection, storage, use and disclosure of your personal and non-personal data and information are carried out. If you do not agree with the practices described in this Privacy Policy, please do not interact with the Website.

II. COLLECTION AND PROCESSING OF PERSONAL DATA

5. General

- We undertake the responsibility to process your personal data fairly, lawfully and in a transparent manner. We will only collect data that are adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed. Collection of data is for specified, explicit and legitimate purposes; data is not further processed in a manner that is non-compatible to these purposes.
- We will not disclose your data to third parties unless this is strictly necessary for the performance of our services; or you have priorly provided such consent; or the processing by a third party serves purposes of our legitimate interest; the law so requires (for example, to execute a court order).
- We take all reasonable care to ensure that the data we collect is accurate, and where necessary, kept up to date. We do not knowingly collect or process personal data of persons under the age of 18. If you are under 18, please do not use the Website, do not request the provision of a service and do not provide us with any personal data.
- The management and protection of your personal data by us is governed by the terms of this Privacy Policy and the relevant provisions of European law relating to the protection of individuals from the processing of personal data. Any possible future change to the above regulatory framework will be incorporated in this Privacy Policy.

4. HOW and WHY we use your personal data collected via the Website

Any personal data that you either provide us with, either mandatorily or optionally through the Website or we collect from third parties via the Website, are being processed for the legal purposes referred to below. Indicatively, we collect and process your data for:

- i. **Providing Information and Services:** To offer users access to information, articles, updates, and other content available on the website.
- ii. **User Interaction and Communication:**
 - To facilitate user interactions, such as comments, feedback, and inquiries.

- To respond to user queries or requests submitted through contact forms or email.
- iii. **Website Analytics and Performance:** To analyse website usage and performance to improve content, design, and functionality.
- iv. **Compliance and Legal Obligations:**
- To comply with legal obligations, including data protection regulations.
 - To ensure the security and integrity of the website.
- v. **Marketing and Promotions:** To send newsletters, updates, and promotional materials (with user consent).
- vi. **Recruiting:** Collect CVs and other information when sending a CV via the Website
- vii. **Statistical and business analysis.**
- viii. **For other purposes,** we will notify you about or identify you on a case-by-case basis, at the point where your information is originally collected.

The legal basis for the use of information about you is one of the following:

- compliance with a legal obligation to which we are subject.
- the performance of a contract to which you are a party.
- a legitimate interest that is balanced against your interests to the protection of your information.
- where none of the above applies, your consent (which we will ask for before we process the information).

When consent is the legal basis for the processing, you may withdraw your consent at any time, so that we cease processing your data for that particular purpose. Please contact us at our contact details mentioned in Section 2 to withdraw your consent at any time.

When our legitimate interest is the basis for the processing, you may oppose to such processing (opt-out) by contacting us. It should be noted, however, that the Company is entitled to demonstrate legal reasons for the processing for which data processing is fairly balanced against your rights and the protection of your privacy.

To opt-out from receiving commercial communication such as newsletter, you can click on the unsubscribe button at the bottom of the e-mail you have received. Please do not use do not use the option forward to junk or spam.

When we process your data for statistical purposes, we take all necessary safeguards to collect and process data in a way that does not identify a particular data subject and does not affect your rights and freedoms, especially your privacy.

Learn More:

Purpose of processing	Data we process	Legal basis
Providing information/ presenting our products/services We process your data: To inform you about our products/services (when you submit your data to be informed of their availability and any future services we may add, when you wish to get in touch with a member of our team to explore cooperation opportunities, etc.)	Identity Data Demographic Data Communication Data	Your consent
User Interaction and Communication: We process your data To facilitate user interactions, such as comments, feedback, and inquiries. To respond to user queries or requests submitted through contact forms or email	Identity Data Demographic Data Communication Data Cookies data	Your consent
Website Analytics and Performance: We process your data To analyse website usage and performance to improve content, design, and functionality.	Demographic Data Technical data Cookies data	legitimate interest in the context of improving the content of its Website; consent if you give your consent to the cookies on the Website
Compliance and Legal Obligations: We process your data To comply with legal obligations, including data protection regulations. To ensure the security and integrity of the website.	Identity Data Demographic Data Communication Data Cookies data	a) legal obligation for the data we process in the context of our compliance with legal obligations; b) legitimate interest in maintaining the security and integrity of the Website

Marketing and Promotions We process your data To send newsletters, updates, and promotional materials (with user consent).	Identity Data Demographic Data Communication Data Cookies data	Your consent if you subscribe to the newsletter mailing list via the Website
Recruiting / Hiring We process your data: To contact you further to your interest in a job vacancy To assess your CV and application To present you with a job offer	Identity Data Communication Data Professional Data	Our pre-contractual obligations with regards to assessing your application, contacting you for an interview, sending you assessment tests, presenting you with a job offer. Your consent to keep record of your CV, personal details and credentials for a subsequent job opening Our contractual obligation for data processing in relation to our employment
Statistical & business analysis for performance improvements and compilation of reports We process your data: to improve our Website (based on technical data analysis and feedback analysis), adopt new business models and extract reports	Technical data Cookie Data Other data on a case-by-case basis	Our legitimate interest for the further processing of aggregated data for statistical and business analysis to improve our Website and our products/services for which data processing is fairly balanced against your rights and the protection of your privacy. Your consent, where we directly ask you to provide answers to questionnaires, surveys etc

WHO do we share your information with and for what purposes?

- We may transfer personal data submitted to us through our Website to other providers such as subcontractors we use to perform certain Services (e.g. our hosting service provider, our website development team etc.)
- Upon request and further notice, you may be redirected to other websites operated by us, or third parties, which will collect your personal data. Once you are transferred to the other website, we do not share any of the data provided to us with the third party.
- We may also transfer personal data submitted to our subsidiaries and/or affiliate companies, subject to appropriate contractual, technical and organizational safeguards.
- We reserve the right to disclose your personal data to a third party that we choose to transfer all or part of our business. In addition, in the event of a merge or redemption or other change in our business, the new owners, etc. have the right to use your personal data in the same way according to this Privacy Policy.
- Your data may be communicated to competent judicial, police and other administrative authorities upon their request and in accordance with the applicable laws. Moreover, in case of a statutory provision, a service order or a formal preliminary examination, our Company has the right to render all relevant information available to a competent authority.
- **Transfers:** The Company generally keeps and processes your personal data within the European Economic Area (“**EEA**”). We do not regularly transfer data outside the EEA. When your data is to be transmitted to third countries outside the EEA or International Organizations for which no European Commission adequacy decision is available, all the appropriate safeguards provided for in the applicable data protection legislation on the transfers to third countries.

III. PROTECTION AND MANAGEMENT OF YOUR PERSONAL DATA

SECURITY of your personal data

We take appropriate technical and organizational measures to protect your personal data from unauthorized disclosure, use, conversion or destruction. Where appropriate, we use encryption and other technologies that can help secure any information you provide us. We also ask our service providers to comply with privacy and data protection requirements.

More specifically, your personal data are managed exclusively by specially authorized personnel of the Company under our control. To conduct the processing, the Company selects individuals or third parties with corresponding professional qualifications that provide sufficient guarantees in terms of technical knowledge and personal integrity to maintain confidentiality. Company, through its respective contractual commitments and its partners, takes all necessary security measures to protect and secure confidentiality and integrity of personal data. In any case, the security of your personal data is subject to reasons beyond Company’s influence, as well as to reasons resulting from technical problems of the network that are not controlled by the Company or reasons of force majeure events. When extracting reports for statistical analysis, we anonymise the respective data upon which the research is based before creating the reports.

HOW LONG will information about you be kept?

We will retain information about you for the period necessary to fulfil the purposes for which the information was collected. After that, we will delete it. Data retention periods may vary depending on the purposes for which the information was collected. Please note that in some circumstances, you have the right to request a deletion of the information. Yet, we are sometimes legally obliged to retain the information, for example, for tax and accounting purposes.

To determine the data retention time of your personal data, we consider the nature of your data, the quantity, purpose, security, etc. You have the right to request from us to delete your data. To exercise your rights, please visit Section 9 of this Privacy Policy.

Learn More:

Purpose of processing	Retention Timeframes
Presenting our products/services	Data received to communicate with you and present you with information about our products/services are kept until said communication is conducted and for 2 years following that, based on our legitimate interest to retain proof of the communication. In the occasion that we do not get in touch, your data is kept for a total of 2 years. If you show an interest in our products/services or if we eventually cooperate with you, the data will be kept for the duration of our cooperation or for as long as you interact with us; after your last interaction with us, we will only keep your data for as long as is necessary, subject to tax and other laws by which we must abide.
Recruiting	Information provided in the context of a job application for which you were not recruited, will be kept for as long as the evaluation lasts and 12 months following our last communication based on our legitimate interest to keep proof of communication. We may ask for your consent to keep your information longer and possibly inform you for new openings. In such a case, we will inform you about our applicable data retention policy at the time. If you are eventually recruited, your data will be kept for the duration of our cooperation and for as long as indicated in our respective corporate policy.
Marketing	When you provide personal data to receive marketing communication, your data will be kept for 2 years since your last interaction.
Statistical & business analysis	We have the right in certain circumstances to anonymize some sets of data for research or statistical purposes, in a way that it cannot be associated with an identifiable person; we reserve the right to use this anonymized information for an indefinite period.

Your Rights And Your Options

How to exercise your rights:

True & accurate data: You must always provide specific, accurate and true data and/or facts so that we can answer and/or satisfy accurately your request. Otherwise, Company shall not be held liable for any faults that are outside of its control. Additionally, we have the right to reject requests that are unfounded, excessive, abusive, made in bad faith or are illegitimate in the framework of the legal provisions. We may also ask for clarifications to understand your concerns and expectations to address your request more effectively.

Identity verification: We are entitled to ask you proof of identify to fulfil your rights.

Cost: You will not have to pay to exercise your rights in relation to personal data unless otherwise provided by law or in cases where the request is unfounded or excessive. In that case, we may charge a reasonable fee. We will inform you for any possible charge before we carry out your request.

Timeframes: Company aims at answering all valid requests the latest within one (1) month from their receipt, unless the request is extremely complicated or the data subject has submitted multiple requests, in which case we aim at answering them within three (3) months. In case we need more than one month to carry out the request for the reasons mentioned above, we will inform you accordingly.

Right (articles below refer to GDPR)	Explanation
Right of Access (article 15)	You can request to: Confirm that Company processes your personal data. Provide you with access to any personal data that you do not already have at your disposal. Provide you with other information about your personal data, such as what data Company has, what it uses it for, to whom it might transfer it, whether it transfers it abroad, how it protects it, how long it retains it, what are your rights as a data subject, the process to submit a complaint, the sources of your data (to the extent such information has not already been provided in this Privacy Policy).
Right to Rectification (article 16)	You can request to rectify inaccurate personal data. Company may seek to verify the accuracy of the data before it rectifies it.
Right to Deletion/ Right to Erasure (article 17)	You can request Company to erase your Personal Data in case: you have withdrawn your consent at any time when they are no longer needed for the purposes they have collected if they have been illegally collected when you object to the processing (or opt-out) Company is not obliged to comply with a request to erase such data if the processing is necessary: for compliance with a legal obligation for the fulfilment of another legitimate purpose or another legitimate legal basis for the establishment, exercise or defence of legal claims

Restriction of processing (article 18)	You can ask us to restrict the processing (i.e., store but not process) of your personal data when: their accuracy is contested (see rectification), so that we can verify the accuracy of the personal data or the personal data have been unlawfully processed but you oppose to the erasure of the personal data or they are no longer necessary for the purposes, which they were collected for, but you still need them for the establishment, exercise or defence of legal claims or there is another legitimate purpose of processing or other legal basis. You have exercised your right to object and you wait for its verification
Right to Data Portability (article 20)	When processing is based on your consent and is carried out by automated means, you may request that we provide your personal data in a structured, commonly used and machine-readable format, or you may request to be transferred directly to another controller. However, this right concerns only the data provided by the data subject and not any data produced by the controller based on already collected data.
Right to Object (article 21)	You may at any time object to any processing of your personal data, which is based on the legitimate interest of Company or the performance of a task carried out for reasons of public interest. If you exercise your right to object, Company has the right to demonstrate compelling legitimate grounds for the processing which override the rights and freedoms of the data subject, however your fundamental rights and freedoms will not be affected.
Right not to be subject to automated individual decision-making, including profiling (article 22)	Company doesn't make decisions based solely on automated processing of your personal data for the purposes of the Services. In any case, we inform you that you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
Opt-out (from consent)	You have the right to withdraw your consent, where consent is the basis for the processing. Any withdrawal is valid for the future and any processing conducted by Company up until the point of withdrawal, is lawful.

Amendments

This Privacy Policy was last updated on 01/11/2024. We will routinely update this Privacy Policy to clarify our practices and to reflect new or different privacy practices, such as when we add new services, products, functionality or features to the Website.

You acknowledge and agree that any use of the Services herein, following any Amendments constitutes a confirmation of your acceptance of this Privacy Policy. Please read this Privacy Policy carefully and review it periodically for the latest information about our privacy practices.

If you wish to be provided with any clarification or information regarding the changes or have any reservation or question about them (changes), you may reach out to us at our contact details listed above. Please note that any information / clarification about changes to this Policy given to you the way described above does not constitute a substitution, or any modification of this Policy.