

SOFT ONE GROUP
DATA PROTECTION POLICY

May 2018

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1. INTRODUCTION

SOFT ONE Group (hereafter, "Group") is committed to conducting its business in accordance with all applicable Data Protection legislation/regulations, including, where applicable, the European Union's General Data Protection Regulation 2016/679 (GDPR), and in line with the highest standards of ethical conduct.

The present Policy sets forth rules, practical steps and the expected behaviours of SOFT ONE Group Employees in relation to any operation or set of operations which is performed on Personal Data such as collection, recording, organization, retention, use, transfer, disclosure and destruction of any Personal Data processed by a SOFT ONE Entity.

Personal Data is subject to certain legal safeguards and other regulations, which impose restrictions on how organizations may process Personal Data. Each SOFT ONE Entity as a Controller or a Processor, is responsible for ensuring compliance with Data Protection legislation/regulations and obligations/ restrictions set forth in this Policy. Noncompliance with this Policy may expose SOFT ONE Group to complaints, regulatory sanctions and fines, clients' or other third parties' claims and potential reputation damage, and its management/ the SOFT ONE Group Employee involved to prosecution for criminal offences and disciplinary actions.

SOFT ONE Group's leadership is fully committed to ensuring and monitoring continued and effective implementation of the present Policy and expects that all SOFT ONE Group Employees, its Processors/ Sub-Processors, as well as all Third Parties will engage and share this commitment.

The management team of each SOFT ONE Entity must ensure that all SOFT ONE Employees of the respective SOFT ONE Entity responsible for Personal Data processing operations are aware of and comply with the contents of the present Policy.

Each SOFT ONE Entity will ensure that all its Processors/ Sub-Processors, as well as all Third Parties are aware and comply with the contents of the present Policy. In addition, assurance of such compliance must be obtained from all parties, whether legal entities or individuals, prior to granting them access to Personal Data processed by SOFT ONE Entities.

2. SCOPE

The present Policy applies: (a) to the processing of Personal Data in the context of the activities of a SOFT ONE Entity in the European Union; and (b) to the processing of Personal Data of Data Subjects who are in the European Union by a SOFT ONE Entity not established in the European Union, where the processing activities are related to the offering of goods or services to such Data Subjects in the European Union or monitoring the behaviour of such Data Subjects in the European Union.

The present Policy applies to all processing operations of Personal Data by automated means (i.e. data kept in electronic form) as well as processing by non – automated means which form part of a structured Filing System.

The present Policy has been designed to establish a European baseline standard in line with the GDPR, for processing operations and Personal Data protection by all SOFT ONE Entities. In instances where national laws impose stricter requirements than those set forth in the present

Policy, the national law requirements shall apply. Moreover, where national laws impose requirements not addressed in the present Policy, the relevant national law requirements must be met.

Where the present Policy and national law provide conflicting requirements and/or in situations of uncertainty, prior consultation with the Group Data Protection Officer for clarifications and guidance is mandatory.

3. DEFINITIONS

Breach of Personal Data: a breach of security that results in accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to Personal Data that were transmitted, stored, or otherwise processed.

Clients: Clients of SOFT ONE Group, natural persons or legal entities, to whom the Group provides consulting services and advice with respect to the purposes of Group's business activity.

Consent: any indication of the will of the Data Subject, freely given, specific, explicit and in full knowledge, by which the Data Subject expresses that it agrees, by declaration or with a clear affirmative action, that the Personal Data concerning are processed.

Controller: a 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. For the purposes of the present policy, SOFT ONE Group is designated as a Controller to the extent that determines the purposes and manner of Processing of Personal Data. Depending on the Processing, SOFT ONE Group may qualify as a Processor.

Data Subject: the identified or identifiable natural person to whom the Personal Data and / or Sensitive Personal Data are referred to.

Personal Data: any information relating to an identified or identifiable natural person whose identity can be directly or indirectly verified, in particular by reference to an identifying characteristic such as, indicatively and without limitation, name, telephone number, e-mail address, identity number, tax ID number.

Personnel: regular and/ or temporary personnel employed in SOFT ONE Group with a contract of dependent employment, non-fixed term and/ or fixed-term, full-time and/ or part-time employment.

Processing: any act or set of operations carried out with or without the use of automated means in Personal Data or in sets of Personal Data such as collection, recording, organization, structuring, storage, adaptation or alteration; retrieval, search, use, disclosure by transmission, dissemination or any other form of disposal, association or combination, restriction, erasure or destruction.

Processor: a natural or legal person, public authority, agency or other body, which processes Personal Data on behalf of the Controller.

Records of processing activities: the record/ files that SOFT ONE Group maintains under its responsibility, either as a Controller or a Processor (if applicable), pursuant to article 30 GDPR.

Special Categories of Personal Data: ("Sensitive Personal Data"): Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic data, biometric data, health or data concerning sex life or the sexual orientation of the individual. Criminal records shall be treated as Special Categories of Personal Data.

Supervisory Authority: means an independent public authority which is concerned by the processing of personal data because:

- a) the controller or processor is established on the territory of the Member State of that supervisory authority;
- b) data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or
- c) a complaint has been lodged with that supervisory authority;

Suppliers: consultants, specialists and other professionals offering their services and/ or products to SOFT ONE Group, including, but not limited to, external advisers/ experts, electronics suppliers, support and maintenance of equipment and software, accounting, as well as companies providing administrative support services and payroll services.

4. IMPLEMENTATION OF THE PERSONAL DATA PROTECTION POLICY

4.1. Notification and Enforcement of the Personal Data Protection Policy

The present Policy is posted and accessible to all SOFT ONE Group Personnel.

SOFT ONE Group undertakes all necessary actions, including educational activities and organization of training programs and seminars at regular intervals, in order to ensure that the Personnel is aware of and complies with the present Policy.

SOFT ONE Group ensures that any third parties processing data on its behalf (e.g. Suppliers) are aware of and comply with the content of the present Policy and the legal and regulatory framework for the protection of Personal Data in general. Third-party compliance must be ensured in any way prior to such third parties being granted access to Personal Data processed by SOFT ONE Group (e.g. Personal Data of Personnel, Personal Data of end users, etc.).

4.2. Data protection by design

In order to ensure that all the requirements for the protection of Personal Data have been integrated and complied with when designing new systems and/ or procedures and reviewing and adapting existing systems and/ or procedures, an authorization procedure should be established for each of the systems and/ or procedures.

If necessary, SOFT ONE Group must, as a Controller, ensure that a Data Protection Impact Assessment (DPIA) is carried out for each of the new and/ or revised systems and procedures.

4.3. Compliance monitoring

In order to ensure compliance with the provisions and requirements of the present Policy, the Group's Data Protection Officer undertakes an annual compliance check, which will assess, inter alia, the following issues:

- the compliance with this Policy, including responsibility, information, awareness and training of Personnel;
- the effectiveness of business practices related to Personal Data, including the exercise of rights of Data Subjects, Personal Data transfers, the management of Personal Data breach incidents and the complaints relating on Personal Data issues;
- the level of understanding with respect to the present policy and any other policy related to Personal Data;
- the update of the present Policy and any other policy related to Personal Data;
- the accurate recording of the Personal Data collected and stored within SOFT ONE Group and the keeping of the SOFT ONE Group's Records of Processing Activities;
- the compliance of the Processors with the provisions of the present Policy;
- the adequacy of procedures to address incomplete compliance with the present Policy and incidents of Personal Data Breach.

At the end of each annual audit, the Group's Data Protection Officer undertakes the planning of a program and the establishment of a timetable aiming to correct and restore discrepancies

found during the evaluation of the findings of the audit. The Group's Data Protection Officer issues submits his/her reports to the Group's management.

5. PROTECTION OF PERSONAL DATA

SOFT ONE Group adopts and acts in accordance with the following principles in the Processing of Personal Data:

- ***Legality, Objectivity, Transparency***

Personal Data is subject to lawful and fair Processing in a transparent manner with respect to the Data Subject. SOFT ONE Group informs the Data Subject in a complete and transparent manner about the Processing of its Personal Data, submits the Personal Data solely for the purposes of the Processing that is classified as legal according to the national and European legislation.

- ***Limitation of scope***

SOFT ONE Group collects Personal Data for defined, explicit, and legitimate purposes and does not subject them to further Processing in a way that is incompatible with those purposes, always in accordance with the applicable legislation.

- ***Minimization of Data***

Personal Data is appropriate, relevant to the activity and orderly functioning of SOFT ONE Group and its services and limited to the measure necessary for the purposes for which it is processed. SOFT ONE Group does not collect and store Personal Data beyond what is required.

- ***Accuracy***

SOFT ONE Group ensures that the Personal Data that is processed is accurate and up-to-date. SOFT ONE Group takes all reasonable steps to immediately erase or correct Personal Data, which is inaccurate, in relation to the purposes of the Processing.

- ***Limitation of the storage period***

In order to ensure that the data needed for the establishment, exercise or defense of legal claims is available, SOFT ONE Group retains Personal Data in a form that permits the identification

of Data Subjects only for the maximum limitation period provided under the respective national law or, in case of multijurisdictional cases, the maximum limitation law provided in any of the jurisdictions involved.

SOFT ONE Group will retain the Personal Data for a longer period only for purposes of archiving due to public interest or for purposes of scientific and statistical and/or historical research and respecting the appropriate technical or organizational measures required by the national and European legislation for the protection of the rights and freedoms of Data Subjects.

As soon as Data Subjects Personal Data are no longer required for the above-mentioned purposes, they will be deleted or anonymized, to the extent possible.

- ***Integrity and Confidentiality***

SOFT ONE Group processes the Personal Data in a way that guarantees its proper security, ensuring, inter alia, its protection against unauthorized or unlawful Processing and accidental loss, destruction or deterioration, using appropriate technical or organizational measures.

6. PERSONAL DATA COLLECTION AND NOTIFICATION

SOFT ONE Group collects Personal Data either directly from the personal Data Subject or from another source in a lawful manner and provides the subject with all necessary information in connection with the Processing of its Personal Data either at the time of collection (in case that Personal Data is received by the Subject itself) or within a reasonable time, depending on the circumstances of each case (in case that Personal Data is obtained from another source). If the Personal Data may be disclosed to another recipient, the Data Subject is updated when the Personal Data is first disclosed to that recipient.

When processing is based on consent, SOFT ONE Group must be able to demonstrate that the Data Subject has consented to the Processing of their Personal Data.

7. PROCESSING OF PERSONAL DATA

7.1. Processing purposes

SOFT ONE Group uses and processes the Personal Data acquired, inter alia, for the following purposes:

- the administrative organization and operation of SOFT ONE Group;

- the provision of services to its Clients of SOFT ONE Group;
- the commercial activity of SOFT ONE Group with Suppliers;
- carrying out background checks and screening activities in relation to the Client and the relevant persons as part of the performance of a contract

- prevention and investigation of criminal offences and other misconduct (e.g. conducting internal investigations, data analysis to combat fraud);

SOFT ONE Group, acting as Controller, processes the Personal Data collected by itself always in accordance with the applicable regulatory framework and its contractual obligations towards the Data Subjects.

In some cases, Personal Data may be further processed for purposes other than the original purposes for which it was collected. In such cases, guidance and approval must be sought before any such processing may commence.

7.2. Special Categories of Data («Sensitive Personal Data»)

In the context of its services and activities, SOFT ONE Group may be required to process Special Categories of Personal Data. Such Processing should be made always in accordance with the personal data protection legal framework.

8. Data Subjects' rights

8.1. General Provisions

SOFT ONE Group ensures that all Data Subjects shall be entitled to the unobstructed exercise of their rights regarding their Personal Data. In particular, each Data Subject shall enjoy the following rights, as provided by the relevant Personal Data protection framework:

- right of access to their Personal Data;
- right to rectification of their Personal Data;
- right to erasure of their Personal Data (“right to be forgotten”);
- right to restriction of processing of their Personal Data;
- right to data portability, where applicable;
- right to object to the processing of their Personal Data;
- right to object to automated decision-making, including profiling.

SOFT ONE Group establishes and applies procedures for the fulfillment of such rights and the careful consideration of any request submitted by the Data Subject and is related to the exercise of any of the aforementioned rights. The relevant form may be found on Annex 1 of the present policy.

8.2. Right of access by the Data Subject

SOFT ONE Group provides the Data Subject with the right to obtain confirmation as to whether or not their Personal Data are being processed and, where that is the case, access to the Personal Data and the following information:

- the purposes of the Processing;
- the categories of the Personal Data concerned;
- the recipients or categories of recipients to whom their Personal Data has been or will be disclosed and, in particular, to recipients in third countries or international organizations;
- the envisaged period for which the Personal Data will be stored or the criteria used to determine such period;
- the existence of the right to request rectification or erasure of Personal Data or restriction of processing of Personal Data;
- the right to lodge a complaint with the DPA or other competent Supervisory Authority;
- where the Personal Data are not collected from the Data Subject, any other available information as to their source;
- the existence of automated decision-making procedure;
- appropriate safeguards relating to the transfer of the Personal Data to third countries or international organizations, as the case may be.

The Data Subject may request to receive a copy of all their Personal Data that are being processed. For any further copies requested by the Data Subject, SOFT ONE GROUP may charge a reasonable fee based on administrative costs. Where the Data Subject makes the request by electronic means, and unless otherwise requested by the Data Subject, the information shall be provided in a commonly used electronic form.

8.3. Right to rectification

SOFT ONE Group provides the Data Subject with the right to obtain without undue delay the rectification of inaccurate Personal Data as well as the completion of incomplete information regarding their Personal Data.

8.4. Right to erasure («to be forgotten»)

SOFT ONE Group provides the Data Subject with the right to obtain the erasure of Personal Data concerning them without undue delay and it shall have the obligation to erase Personal Data without undue delay if one of the following grounds applies:

- the Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- the Data Subject withdraws consent on which the processing is based;
- the Data Subject objects to the processing of their Personal Data and there are no overriding legitimate grounds for the processing;
- the Personal Data has been unlawfully processed;
- the Personal Data has been erased for compliance with a legal obligation under the national and / or European legislation;
- the Personal Data has been collected in relation to the offer of information society services.

However, SOFT ONE Group reserves the right to deny the erasure of Personal Data, as long as the processing is necessary:

- for compliance with a legal obligation which required processing on the basis of national and/or European legislation or for the performance of a task carried out in the public interest;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
- for the establishment, exercise or defense of legal claims.

8.5. Right to restriction of Processing

SOFT ONE Group accepts the requests of Data Subjects to obtain restriction of processing of their Personal Data where one of the following applies:

- the accuracy of the Personal Data is contested by the Data Subject, in which case the processing restriction applies for the period required to verify the accuracy of such Personal Data;
- the processing is unlawful, and the Data Subject opposes the erasure of the Personal Data and requests the restriction of its use instead;

- SOFT ONE Group no longer needs the Personal Data for the purposes of processing, but such data is required by the Data Subject for the establishment, exercise or defense of legal claims;
- the Data Subject has objected to processing, pending the verification whether the legitimate grounds of SOFT ONE Group override those of the Data Subject.

In cases where processing has been restricted as per the above, such Personal Data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of other natural or legal persons or for reasons of important public interest.

In any case, SOFT ONE Group shall have the obligation to inform the Data Subject prior to the lifting of the processing restriction.

8.6. Right to portability

SOFT ONE Group, if applicable, grants the Data Subject the right to receive the Personal Data concerning them in a structured, commonly used and machine-readable format, as well as the right to transmit such data to another controller without hindrance from SOFT ONE Group.

In exercising their right to data portability, the Data Subjects shall have the right to have the Personal Data transmitted directly from the Company to a different controller, where technically feasible.

8.7. Right to object

The Data Subject may, at any time and on grounds relating to their particular situation, object to the processing of their Personal Data unless the Company demonstrates compelling legitimate grounds for the processing which override the interests, rights and the freedoms of the Data Subject or for the establishment, exercise or defense of legal claims.

8.8. Automated individual decision-making, including profiling

SOFT ONE Group does not carry out individual decision-making, including profiling.

8.9. Exercise and enjoyment of rights

The Data Subjects should submit all requests with respect to the exercise of any of their rights in writing to the responsible person for Data Protection issues of SOFT ONE Group, who

immediately registers the request and undertakes to reply within thirty (30) days as of the receipt of the written request. The responsible person for Data Protection issues should identify the applicant of the request as the Data Subject and the existence of legal interest prior to considering such request and reverting with a reply.

In case the reply within thirty (30) days is not possible, the responsible person for Data Protection issues must, in any case, inform the applicant of the progress of their request and the estimated reply date.

9. Breach of Personal Data

9.1. Introductory remarks

SOFT ONE Group shall implement all appropriate technical or organizational measures to address Personal Data breaches in order to prevent incurring damage to natural persons, such as loss of control over their Personal Data or restriction of their rights, discrimination, identity theft or fraud, financial loss, unauthorized reversal of pseudonymization, damage to reputation or other important economic or social disadvantage for the natural person concerned.

Should any person be aware of a breach of Personal Data or similar event, he should immediately notify SOFT ONE Group by using the report form attached hereto as Annex 2.

9.2. Notification of a Personal Data breach to the Supervisory Authority

In the case of a Personal Data breach, SOFT ONE Group shall without undue delay and, where feasible, no later than 72 hours after having become aware of it, notify the Personal Data breach to the Supervisory Authority, unless the breach is unlikely to result in a risk to the rights and the freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

The Processor shall notify the Controller without undue delay after becoming aware of a Personal Data breach.

9.3. Communication of a Personal Data breach to the Data Subject

When the Personal Data breach is likely to result in a high risk to the rights and freedoms of natural persons, SOFT ONE Group shall communicate the Personal Data breach to the Data Subject without undue delay, describing in clear and plain language the nature of the Personal Data breach and contain at least the name and contact details of the contact person for Data

Protection issues of SOFT ONE Group, the possible consequences of the breach, as well as the measures taken or proposed to be taken by SOFT ONE Group to address the breach.

Communication of the Personal Data breach to the Data Subject shall not be required if any of the following conditions are met:

- SOFT ONE Group has implemented appropriate technical and organizational protection measures, and those measures were applied to the Personal Data affected by the Personal Data breach, in particular those that render the Personal Data unintelligible to any person who is not authorized to access it, such as encryption;
- SOFT ONE Group has taken subsequent measures to ensure that the high risk to the rights and freedoms of the Data Subjects is no longer likely to materialize;
- The communication would involve disproportionate effort. In this case, a public communication or a similar measure may take place, whereby the Data Subjects are informed in an equally effective manner.

10. Transfer of Personal Data

10.1. General provisions

In the context of its activities, SOFT ONE Group may transfer Personal Data to countries within the EEA and countries recognized as having an adequate level of protection, as well as to third, non-EEA countries, where one of its offices or third parties with whom SOFT ONE Group collaborates are established. Personal Data may be transferred to international organizations, should this be necessary for the provision of SOFT ONE Group services.

10.2. Transfer of Personal Data to third countries or international organizations

For the proper and adequate provision of its services, SOFT ONE Group may transfer Personal Data of its Clients and/ or Personnel to Third Countries or to an international organization. SOFT ONE Group shall transfer such Personal Data in accordance with the procedural rules set for such transfer, under the relevant data protection legal framework.

Such transfers are subject to the following conditions:

- the European Commission has decided that the third country or territory or one or more specified sectors within that third country or international organization ensures an adequate level of protection to the Data Subject with respect to their Personal Data; or

- appropriate safeguards have been provided by SOFT ONE Group and enforceable Data Subject rights and effective legal remedies for Data Subjects are available. SOFT ONE Group ensures the implementation of binding corporate rules or standard data protection clauses for the transfer of Personal Data to third countries or other *ad hoc* mechanisms;
- the Data Subjects are fully informed about the transfer of their Personal Data and have expressly consented to such transfer;
- the transfer is necessary for the performance of a contract between the Data Subject and SOFT ONE Group or for the implementation of pre-contractual measures taken at the request of the Data Subject;
- the transfer is necessary for the conclusion or performance of a contract concluded between SOFT ONE Group and another natural person or legal entity in the interest of the Data Subject;
- the transfer is necessary for important reasons of public interest or for the establishment, exercise or defense of legal claims;
- the transfer is necessary in order to protect the vital interests of the Data Subject;
- the transfer is made from a register intended to provide information to the public and is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down by EU or Member State law for consultation are fulfilled in the particular case.

10.3. Transfer of Personal Data between SOFT ONE Group entities

In order for SOFT ONE Group to carry out its operations effectively across its entities, there may be occasions where it is necessary to transfer Personal Data from one office to another.

In cases where the transfer of Personal Data is made between SOFT ONE Group entities the transfer is made on available appropriate legal basis.

10.4. Transfer of Personal Data to third parties

SOFT ONE Group may transfer Personal Data to third parties, including external consultants, technical experts, notaries, travel agencies and mobile and landline operators. SOFT ONE Group should ensure that the Personal Data will be processed legitimately and protected appropriately by the third-party recipients, taking into account the existence of professional standards, ethics and secrecy binding the other party.

When the Personal Data are transferred by SOFT ONE Group to third parties acting as Controllers, SOFT ONE Group should enter into an appropriate agreement with such third party in order to clarify each party's responsibilities with respect to the Personal Data transferred.

When Personal Data are transferred by SOFT ONE Group to third parties acting as Processors, SOFT ONE Group will enter into a processing agreement with the third parties ensuring an adequate level of protection with respect to the Personal Data Processing, as per the relevant legal framework for third-party compliance.

11. Technical and Organizational Measures

SOFT ONE Group maintains and processes Personal Data in a manner that ensures its protection. In particular, Personal Data is processed solely by specifically authorized personnel or by Processors which are bound towards SOFT ONE Group with the same obligations regarding Personal Data protection, while all appropriate organizational and technical measures are in place for data security and protection against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access and any other form of illicit processing.

12. Policy maintenance

The present Policy is uploaded and is accessible by all Personnel on the website of SOFT ONE Group.

The present Policy should be amended and/or revised in order to ensure that it reflects the current national and European regulatory framework on Personal Data. Each amended version of this Policy is communicated to the Personnel of SOFT ONE Group and uploaded on its website.

13. Contact details

For any queries please contact the Group Data Protection Officer:

DRAKOPOULOS LAW FIRM

332, Kifissias Av., P.C. 152 33, Halandri, Athens

Tel: +30 210 6836561

E-mail: dpo@softone.gr.

Annex 1 – Data Subject Request form

A. Personal Information

Surname:	
First name:	
Address:	
Postal code:	
Telephone:	
ID/Passport number:	
E-mail:	

B. Relationship with SOFT ONE Group

To help us verify your details and identify your Personal Data, please fill in the following information according to your category:

<p><u>What is the nature of your relationship with SOFT ONE Group (cross the adequate box):</u></p> <p>Employee: <input type="checkbox"/></p> <p>Client: <input type="checkbox"/></p> <p>Supplier: <input type="checkbox"/></p> <p>Partner:/Contractor <input type="checkbox"/></p> <p>Other: <input type="checkbox"/></p> <p>If you chose the Partner/Contractor category or Other, please fill in the type of your relationship with SOFT ONE Group:</p> <p>.....</p>

C. Right exercised

Which right is exercised with the present request/form (cross the adequate box):

- 1. Information
- 2. Access
- 3. Correction
- 4. Erasure
- 5. Restriction of processing
- 6. Portability
- 7. Objection
- 8. Automated individual decision making and profiling
- 9. Revoke of consent

D. Request

Please describe what actions you want SOFT ONE Group to carry out in relation to your Personal Data:

E. Additional information of the request

Your request concerns a specific event and a specific period (cross the adequate box):	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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If Yes, please fill in below:

Describe the event:	
Determine the specific period:	

F. Declaration

I,..... hereby declare that I have read and accepted the terms of the request and confirm that the information I provide to SOFT ONE Group is correct. I understand that SOFT ONE Group has the right to check my information and to request additional information in order to verify them.

Signature:

Date:

G. Request via a Representative

If you act as a representative of the Data Subject, you must produce a notarial PoA or authorization with the authenticity of the signature from a lawyer or competent authority, fill in the details below and sign the declaration above.

Representative's information

Surname:	
First name:	
Address:	
Postal code:	
Telephone:	
ID/Passport number:	
E-mail:	

Data Subject information

Surname:	
----------	--

First name:	
Address:	
Postal code:	
Telephone:	
ID/Passport number:	
E-mail:	

Terms and Conditions of Request

1. The request must be accompanied by all necessary information to enable SOFT ONE Group to respond to it.
2. If the criteria are met, the request is forwarded for assessment of any technical complexity that may affect implementation time with the risk of failing to respect the thirty (30) days period as described by the Regulation. If the complexity of fulfilling the request requires more than twenty (20) days, the agent appointed by SOFT ONE Group will notify the requesting applicant for an extension of up to two (2) months. Otherwise, the process proceeds with the satisfaction of the request.
3. The Subjects submitting the request form must provide the following documents:
 - Proof of identification (eg identity card or driving license or passport).
 - Document proving confirmation of the residence address (e.g electricity bill ect).

In case that the Subject authorizes a third person to submit a request for exercise of a right, a properly legalised authorization is required.
4. The Subject may submit a request for the exercise of a Personal Data right by sending this form, together with the documents under (3) above by e-mail at dpo@softone.gr.

Annex 2 –Breach Report Form

Section 1: Alert of Breach of Personal Data incident	To be completed by the person reporting the Breach
Date of acknowledgment of the Breach:	
Date of occurrence of the Breach:	
Place of occurrence of the Breach:	
Name of the person reporting the Breach:	
Contact information of the person reporting the Breach:	
Brief Description of the Breach and details of the Personal Data concerned:	
Number of affected Subjects, if known:	
Are any Personal Data at risk? If yes, please provide information:	
Brief description of each action taken since the acknowledgment:	
Received by:	