

1. **Introduction**

Whenever a natural person (data subject) comes in contact with PALIRRIA SA (hereinafter "Company") or uses any of its products / services, discloses to it personal information and data (hereinafter "Personal Data").

This Privacy Policy aims to inform the data subject what personal data (PD) the Company collects, why PD are collected, what is the legal basis for processing PD and how the data subject can update, manage, export or delete its own personal information.

Furthermore, this Privacy Policy documents Company's compliance with the relevant legislation and in particular with the General Data Protection Regulation 679/2016 and Company's respect for the protection of privacy and security of personal data.

This Privacy Policy applies to personal data provided to or processed by the Company (as data controller) in the course of its activities.

This Privacy Policy was posted on our website on 02.05.2019 and replaces any earlier post. It is addressed to any natural person who has or intends to have any kind of relationship or cooperation with the Company.

2. **Information**

Further information on the Data Protection Regulation and the terminology used for what constitutes personal data, what is a data subject or the rights the natural person has, based on the legislation for the protection and security of such data, can be obtained from the website of the Greek Data Protection Authority (www.dpa.gr) or by any national Data Protection Authority (DPA).

3. **Who we are**

Palirria was founded in 1957, on the island of Evia-Greece as a privately owned business by the entrepreneur Antonis Souliotis. Its primary purpose was the production and distribution of traditional ready to eat meals for the Greek and International markets. Palirria S.A. remained a personal business until 1982, when it acquired a corporate form with the participation of Antoni Souloitis' sons, Konstantinos and Vasilis.

This corporate structure gave Palirria a potential that resulted in a leadership position in the Greek market. In 1989 Palirria began to invest in modern and technologically advanced facilities and new offices. The project was completed in 1992 with the reallocation of its operations.

In 2000 Palirria established a wholly owned subsidiary, Palirria Bulgaria L.t.d, in order to invest in a new factory to boost export efforts.

From 2010 and afterwards Palirria shifted even more its focus on exports, leading to a significant rise in sales and profits in the next years.

Today, Palirria is the leading Greek exporter of ready to eat meals and proudly holds the position of No 1 Dolma producer in the world and for a good reason. Awards like the Great Taste Award 2013 (UK) and the Superior Taste Award 2016 and 2014 by the International Taste and Quality Institute-Brussels, justify the popularity of our dolmas.

Palirria's products are distributed in more than 40 countries around the globe and total annual production exceeds 17.500 tons.

Our vision is to become a world class ambassador of Greek and Mediterranean Cuisine for consumers around the globe.

Our mission is to sustain growth through customer satisfaction, innovation, commitment to quality and global expansion.

Our management team and staff are committed to this set of **values**:

- ✓ Respect to the tradition of Greek and Mediterranean Cuisine
- ✓ Careful selection of Natural Ingredients
- ✓ High Quality and Food Safety Standards
- ✓ Customer Satisfaction
- ✓ Innovation

Respect to tradition

We rely on authentic Greek and Mediterranean recipes to produce our products and offer consumers worldwide an outstanding homemade Mediterranean food experience.

Quality

Quality food is our priority; therefore we use the highest food safety standards and conduct thorough inspections at every stage of the production process to ensure it. We also select very carefully our ingredients and their freshness and purity is a constant prerequisite for our suppliers.

Customer Satisfaction

Palirria sells to distributors, wholesalers, retailers, ethnic food specialists and food service operators worldwide. Ensuring our customers' satisfaction is embodied in our values and its prioritization is reflected in the long lasting relationship we enjoy with partners and customers. Whether customers are looking for bio, kosher or organic products or even for a specific recipe we are able to meet perfectly their needs. This is another reason why Palirria is trusted by numerous reputable retail chains around the world.

Innovation

We detect upcoming trends and incorporate new ideas in our daily business. We work on traditional recipes and try to incorporate the most innovative technologies in relation to packaging in order to give consumers the best products. New technologies also enable us to produce traditional food on a large scale.

Palirria facilities occupy 22.000 m² in 2 factories in Politika –Evia and Bulgaria , employing approximately 1.000 people. The total production output of 2018 was 22.000 tones or ready meals.

Our headquarters in Greece

Politika unit extends in over 10,500 m² specially-designed facilities and houses the main operation center where the company's strategic development plan is designed, implemented and monitored. Sales and administration staff and production personnel is approximately 180 people and the production capacity of the plant is 25 tons per day. In this plant, we produce our famous dolmas, all pulses-based ready meals and innovative ambient product lines like Past Mia and My Greek Meze. We also produce our ranges of frozen ready meals.

Our factory in Bulgaria

Palirria's facilities in Bulgaria are of the most important investments in relation to expanding its activities around the globe. The unit in Bulgaria increases significantly company's production capacity for the main product which is dolma and has a critical importance to company's success and development.

The factory occupies 9.500 m², Σελίδα 3 από 8 reaches a production capacity of 60 tons per day and occupies around 700 people. In this plant we produce hand rolled stuffed vine leaves as well as all the eggplant-based products. Palirria Bulgaria is acknowledged by the governor of Silven County, as the factory with the highest contribution to the economic development of the region.

In our website you can find information about Palirria's business activities, products and contact details.

4. What PD are processed

Personal data (PD) means any information that can be used to identify directly or indirectly a specific individual (data subject).

Company has to process PD (ie collection, recording, organisation, storage, use, disclosure etc of PD) in the context of the efficient performance of business functions and services and, often, in compliance with relevant legislation and regulations.

The data subject is under no obligation to provide the Company with the personal data, that may be required, but, in the event of a refusal, the Company may not be able to provide specific services or respond to the requests of the data subject with consistency, speed and quality.

When the data subject communicates with the Company in the context of a product survey or contacts the Company, visits Company's website, asks questions, it may be asked for relevant personal information (PD such as: name, address, email, telephone number, etc) depending on the type of cooperation or relationship.

Furthermore, it is likely that the data subject may choose to voluntarily disclose additional PD (as in the case of sending a CV).

5. How PD are collected

Personal data can be collected (ie processed) through a variety of sources. This includes:

- ✓ Personal data that the data subject sends or discloses to the Company directly, (eg during a contact or communication)
- ✓ Personal data that the Company collects automatically, (eg during Company's website visit)
- ✓ Personal data that the Company collects (processes) from other sources, (eg professional chamber or survey data bases).

Most of the PD - that Company processes - are voluntary disclosed for one of the following reasons:

1. Interest of the data subject for Company's products/services. The registration of the natural person in the mailing list of newsletter requires the consent of the natural person and guidance is provided on how this consent is withdrawn.
2. Information disclosed during communication or contact.
3. Information from a previous cooperation of the data subject with either the Company or a Company's representative with whom the data subject had communication or cooperation.
4. The corporate webserver collects automatically information (such as IP address, browser type, the website of origin, the date & duration of site visit or the operating system) whenever someone visits it or interacts with it. The aim is to calculate number of visitors, identify points of interest, check the effectiveness of communication etc. The Company does not process geo-positioning data.
5. The data subject has made an information request, a complaint or enquiry to the Company.

6. The data subject applied for a job or secondment with Company.
7. The data subject contacted Company as a representative of an organisation.

Personal information can be also disclosed to the Company in the following scenarios:

- Collection of personal information as part of an investigation or survey.
- Through Company's partners or cooperating organizations.
- A Company's employee disclosed relevant contact details.
- It is likely to use information from advertising networks, customers or third parties, in order to inform a potential customer about special services / issues that might be of interest.
- The data subject's personal information is publicly available.

When a data subject contacts Company, the latter keeps a record of the communication in order to resolve the individual may have. The Company does not allow any unauthorized entities, especially without the data subject's consent, to have access to personal data.

6. How PD are used

Company processes (i.e. collects, stores, discloses, deletes etc) individual's personal data (PD) only for specific and limited purposes.

In addition, Company processes the natural person's personal data when there is a legal ground for processing and for the sake of, but not limited to:

- Process the data subject's request and ship the product
- Provide data subject with personalized and updated services/products
- Contact data subject on opinion survey (opinion can be posted on the corporate website) or inform data subject about new services or products that may of interest
- Process the data subject's payment or prevent or detect potential frauds
- Respond to questions or complaints that the natural person has asked
- Implement the framework of this Privacy Policy
- Develop and improve the services, communication methods and functionality of corporate websites
- Provide personalised communication and targeted advertising. In cases where Company uses personal data for purposes of direct marketing or promotional communication for new services or other offers that the Company believes may be of interest, the data subject can exercise his / her rights (see §9) by informing the Company that he does not wish to receive such messages in the future (see §11 & 15).

7. PD retention period

Company retains personal data of natural persons for only as long as it is required, depending on the processing scope and as stated in this Privacy Policy.

For example, Company may need to use PD to respond to complaints or queries about a product or service and may therefore retain personal data for a reasonable period of time after the end of a cooperation with a natural person (eg for the period of potential legal claims).

Company may also need to retain personal data for tax / accounting purposes, (retention period is defined by legislation relevant to tax / financial investigation authorities).

Personal data that are no longer needed shall be deleted.

In addition, personal data retention period depends on the legitimate basis of data processing (lawfulness of processing), such as:

- When processing is necessary for the purposes of the legitimate interests pursued by the Company (controller), retention period will be as long as is necessary for the purposes of the legitimate interests pursued by the Company, as data controller, and for as long as is still required until the lapse of any relevant claims.
- When the data subject has voluntarily disclosed his personal data (eg in a request for quotation or newsletter registration), PD (both in paper and electronic form) will be retained for as long as there is a contractual relationship with the natural person or for as long as the relevant legislation imposes or until the consent of the natural person has been withdrawn. In any case, Company will retain the data in accordance with the requirements of the relevant legislation or until the lapse of any related claims.
- If the natural person's consent has been requested for PD processing and there are no other legitimate reasons to continue such processing, and the consent of the natural person is withdrawn, then personal data will be deleted. However, the e-mail address will be maintained to ensure that no message / form is sent to you in the future.
- When processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; the personal data will be retained for as long as there is a contractual relationship with the natural person or for as long as the relevant legislation imposes or until the lapse of any related claims.

8. Disclosure of PD

Company does not disclose or share PD with any third parties, organizations or individuals, for purposes of direct or indirect marketing.

In the following circumstances Company shares information with third parties:

- Data subject's consent: Company shares personal information with companies, organisations and natural persons when there is a natural person's explicit consent.
- External processing: Company discloses PD to partners (third parties) who trust, in order to process PD for Company's use (eg accounting or IT support); in accordance with the Privacy Policy and appropriate confidentiality and security measures, as defined by the EU Regulation 679/2016.
- For legal purposes: Company shares PD with competent public authorities, when it is reasonably necessary and in order to comply with legislation, regulations, etc.
- In the context of scientific research/survey, the Company can disclose anonymized PD.
- For the purposes of the legitimate interests pursued by the Company, personal data can be disclosed to affiliated companies, taking all appropriate technical and organizational measures for data protection and security. In this context, data may be transferred to transport companies or financial institutions (eg for the conclusion of a contract).

9. Data subject's rights

In the context of the Regulation for Data Protection, Company's customers and other data subjects (eg employees, suppliers, partners, etc) have the following rights, which should not be contrary to relevant legislation and regulations.

The rights of data subjects, with respect to personal data protection, are:

- *Right to be informed:* Data subject has the right to be provided with clear, transparent and easily understandable information about the use of his personal data and rights. This Privacy Policy provides relevant information.
- *Right to access and rectification:* Data subject has the right to access, correct or update his personal data at any time.
- *Right to PD's portability:* Data subject can receive his personal data, which he has provided to Company, in a structured, machine-readable and interoperable format, and to transmit it to another controller. This right should apply where PD have been provided on the basis of consent or in the framework of the performance of a contract.
- *Right to erasure:* Data subject has the right to ask Company to erase his personal information in certain circumstances. The exercise of this right can always be done in accordance with legal requirements (eg someone cannot ask for PD delete when labor law or tax authorities require to be retained for 7 years).
- *Right to restriction of processing:* Data subject has the right to ask Company to restrict the processing of information in certain circumstances, including processing for direct marketing.
- *Right of data subject to submit a complaint* to the Hellenic Data Protection Authority, <http://www.dpa.gr/> or any national Data Protection Authority about how Company processes his personal data.
- *Right to withdraw consent:* If data subject has given consent to processing of PD, then has the right to withdraw his consent at any time (although if he does so, it does not mean that anything Company has done with a valid consent up to that date is unlawful). Data subject can withdraw his consent to the processing of PD at any time by contacting Company, through "Contact Us" at Section 15.

Section 11 highlights the ways a data subject can exercise his rights.

10. Company's obligations

Accountability is among Company's obligations with respect the principles of processing PD (ie legitimacy, objectivity and transparency, purpose limitation, minimisation of PD, accuracy of PD, limitation of storage period, security, integrity, and confidentiality).

Company will only process personal data where there is legal ground to do so. The lawfulness of processing is determined according to the scope for which PD are collected and used. In any case, the legal ground will be one of the following:

- Consent: the data subject has given consent to the processing of his or her personal data for a specific purpose (eg consent has been given to receive marketing emails). A given consent can be withdrawn at any time by submitting an email to "Contact Us" (Section 15).
- For the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Compliance with legislation: when processing is necessary for compliance with a legal obligation to which the Company as controller is subject (eg labor or tax legislation).
- Company's legitimate interests: when processing is necessary for the purposes of the legitimate interests pursued by the Company as controller; except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject. Where it is necessary for the Company to understand its customer, promote products/services and operate corporate websites and apps efficiently. For example, Company will rely on its legitimate interest when the content viewed on sites and apps is analyzed, in order to understand its use. It is also in Company's legitimate interest to carry out marketing analysis to determine what products and services may be relevant to the interests of its customers and potential customers.

In addition, appropriate technical and organizational measures are implemented in order to protect both Company and its partners against unauthorized access or alteration, tampering or destruction of possessed PD.

Specifically:

- Data collection, storage and processing practices, including security measures, to protect against non authorized access to systems, are monitored.
- Access to personal information is limited & controlled, and subject to strict contractual obligations of confidentiality.
- In case that outside partners (for maintenance or support purposes) have potential access to PD, certain appendices to the existing cooperation contracts cover the requirements of the Data Protection Regulation.

Throughout the entire processing cycle of PD (from collection to destruction), appropriate technical and organizational measures are taken in order to ensure the confidentiality, integrity and availability of PD. Similar measures are required by third parties handling or processing PD.

Whereas Company's products are indented for children under the age of 15; Company does not knowingly process personal data about children under 15.

11. Access to data subject's PD

Within the scope of the rights granted to the data subject by the Data Protection Regulation, the data subject can view and request a correction or limitation of processing or deleting of his/her PD, (see in detail natural person's rights in Section 9)

The natural person may exercise his/her rights or withdraw his/her consent by sending an [email](#) to "Contact Us" (Section 15) asking for a [Subject Access Request](#) (SAR) form, completing it and submitting the properly filled SAR form to the Company (see section 25, "Contact Us"). Company has to respond to the natural person within one month of the receipt of SAR.

12. Use of Cookies

The corporate website uses cookies to improve visiting experience as well as to ensure the efficient operation of the web pages.

The website visitor (data subject) by choosing "cookies acceptance" provides his/her consent on the use of cookies. Moreover, he/she may choose to see additional information on cookies' use and/or to customize cookies' setting by clicking on [COOKIES DETAILS & POLICY](#).

13. Social Media

The Facebook social media button is available on the corporate website. The integration of these plugins is implemented through addthis.com, by Clearsprings Technologies, Inc., 8000 Westpark Drive, Suite 625, McLean, VA 22102, USA, (a cookie of AddThis facilitates sharing content, such as video, photos, blogs, etc, in social media).

To protect the privacy of a natural person, a technical solution is used to incorporate social plugins that prevent data (eg, IP address) from being transferred to addthis or social networks such as Facebook as soon as the corporate website opens.

When the social plugins are clicked for the first time, only then they are activated. As a result, the visitor's browser retrieves plugins from the addthis servers and presents them as part of the webpage. This way, information (e.g., IP address) is transmitted to addthis in the US and social networks, such as Facebook. In addition, addthis.com can store cookies or so-called "web beacons" on the visitor's computer.

The visitor, when clicks on social plugins for second time, will be able to make full use of the "share" button. If the visitor is member of a social network and clicks on the relevant social plugin, the social network provider may be able to link the information about the visit to the corporate website with the profile data of the visitor on the network. Consequently, the visitor (natural person) is asked to communicate with his/her social network operator for information about these functions.

Detailed information on the operation of addthis.com is available in the addthis.com Privacy Policy (click www.addthis.com/privacy).

By choosing the above social buttons, the visitor of the corporate website, also, gives his consent to all of the above.

14. Links to other websites

Transmitting information via internet is not completely secure. Although Company has take all measures to protect personal data, it cannot guarantee the security of any personal data sent to corporate website while still in transit and so the data subject provides it at his own risk.

Where Company provides links to websites of other organisations, this Privacy Policy does not cover how that organisation processes personal information. Data subjects are encouraged to read the privacy notices of the other websites they visit.

15. Contact Us

PALIRRIA SA
2nd km Psahna – Politika Road,
34 400 Politika Evia, Greece

info@palirria.com
tel +30 22280 24735
fax +30 22280 24113
www.palirria.com