

# **QIVOS**

## **Privacy Policy**

QIVOS

[info@qivos.com](mailto:info@qivos.com) | [www.qivos.com](http://www.qivos.com)

## Contents

<b>1. Who we are.....</b>	<b>3</b>
<b>2. What this Privacy Policy is all about .....</b>	<b>3</b>
<b>3. What information we collect about you and how we collect it.....</b>	<b>4</b>
2.1 Information you provide to us.....	4
3.1 Information we collect automatically when you visit our site .....	5
4.1 Information we collect automatically when you receive our newsletters ....	5
<b>4. How we use information we collect .....</b>	<b>6</b>
<b>5. How we store and secure information we collect.....</b>	<b>7</b>
<b>6. Who do we share your personal information with.....</b>	<b>8</b>
<b>7. How long do we keep your personal information for.....</b>	<b>8</b>
<b>8. Your rights.....</b>	<b>9</b>
<b>9. Changes to Privacy Policy .....</b>	<b>10</b>
<b>10. Πολιτική Προστασίας Δεδομένων Προσωπικού Χαρακτήρα .....</b>	<b>11</b>

## 1. Who we are

We are **QIVOS**, a company residing in **Europe** with its registered office at 4 Papanikoli Str. 15232, Chalandri, **Greece**.

## 2. What this Privacy Policy is all about

This privacy policy governs personal information we collect from you when you're interacting with our site, visiting our site or engaging with our newsletters. This policy explains our approach to your personal information by stating the purposes for which we process your personal information and the legal bases under which we process the information, it explains how we share and disclose this information and sets out your rights in respect of our processing of your personal information, in accordance with applicable data protection legislation.

**Personal information** means information which can be used to identify you either on its own or in combination with other information.

We respect your right to privacy and will only process personal information in accordance with applicable European Union data protection legislation.

QIVOS works with our trusted partners to ensure the safety of your personal information – more on this can be found on **How we store and secure information we collect**.

This policy applies where we are acting as a data controller with respect to the personal information of our website visitors and service users. In particular, for personal information which is being collected primarily by and used by QIVOS and QIVOS determines the purposes and means of the processing of that personal information, **QIVOS is the data controller**, while our trusted partners, which are processing the personal information on our behalf and further to our instructions, are the data processors.

In this policy, “we”, “us” and “our” refer to QIVOS.

### **3. What information we collect about you and how we collect it**

We may collect information about you in the course of our business, including through your use of our site, to send you our news and marketing material and to provide better experience and services to you. We may collect personal information directly by you, through the use of tracking technology or by other sources, such as third-parties, including other affiliates of QIVOS, as described in the following sections.

#### **2.1 Information you provide to us**

We mainly collect only specific personal information of those who wish to (1) be communicated by us via e-mail, (2) request a report / e-book / whitepaper / case study / demo or (3) contact us directly.

In particular, if you wish to be added to our newsletter, we will ask for your e-mail address at the time of your subscription. When you request a report / e-book / whitepaper / case study / demo or contact us directly, we will ask for the following information: your name, your company’s name, your job title, your telephone number and a valid e-mail address at which we may contact you (should you consent to do so).

### 3.1 Information we collect automatically when you visit our site

We may also collect personal information about you directly or from third parties, based on your activity **when you visit our site**, through the use of cookies and other tracking technology. This information includes the web pages you visited, how long you spent on the site or the files you requested to download.

- **Log Information:** We collect information about your use of our microsite, such as your IP address, the type of browser that you use, the time and frequency of your visits and the pages you checked.
- **Device Information:** We collect information about the computer or mobile device that you use to access our site, including the hardware model, operating system and version, unique device identifiers, and mobile network information. We may also collect information about the location of your device each time you visit our microsite.
- **Information Collected by Cookies:** We may also collect information about you via **cookies**. Cookies are small data files that are downloaded to your computer or are stored in device memory that help us improve your experience, and track usage of our Platform. You can find out more about cookies we use and how to manage and disable cookies in our [Cookie Policy](#). The Cookie Policy forms part of this Privacy Policy.

### 4.1 Information we collect automatically when you receive our newsletters

We may also collect information about you, based on your activity **when you receive our newsletters**, through the use of cookies and other tracking technology. This information includes the newsletters you read (opened) and the links you clicked.

You can find out more about cookies we use and how to manage and delete cookies in our [Cookie Policy](#). The Cookie Policy forms part of this Privacy Policy.

## 4. How we use information we collect

**To communicate with you about us:** We use your e-mail information to send you (1) our monthly newsletters and (2) newsletters that may contain offers related to our products. You can always opt-out of these communications **by clicking the unsubscribe link** found at the newsletter.

**To personalize your experience:** We also provide personalized communications based on the personal information you have provided to us, your online behavior when browsing our site and your level of engagement to our newsletters. For example, a newsletter containing a specific offer may be sent to you depending on (1) your job title, (2) online behavior when browsing our site and/or (3) your interactions with our previous newsletters. You can always opt-out of these communications **by clicking the unsubscribe link** found at the newsletter.

In addition to the purposes described in this Privacy Policy, QIVOS may also use information collected through our website and the services offered herein or may occasionally contact you for the following purposes: (1) to communicate with you regarding your participation in a survey or to invite you to participate in one, (2) to comply with any legal obligation and/or legal claim and to enforce our legal rights, (3) for internal purposes such as quality control, website performance and efficiency and system administration, (4) for fraud detection and in order to ensure that the website is secure and protected against fraud incidents (5) for identity and contact details confirmation and verification for prevention of abusive and/or fraudulent use of our website, (6) in order to reply to any of your requests and/or questions.

### **Legal Basis for processing:**

We collect and process information about you according to the applicable EU laws. Specifically, we rely on the following legal bases in order to process your personal information for the abovementioned purposes:

- We rely on the consent that you give us to send you marketing material, by subscribing to our newsletter or requesting our reports and checking the appropriate option, to offer you personalized experiences, or inter alia for the use of cookies which are not strictly necessary for the operation of our website and for the safeguarding and maintenance of the security of our website and of our Services.
- It is necessary for us to use your personal information, as it satisfies our legitimate interest, which is not overridden by your data protection interests, such as promoting our Services, optimizing our website's performance and enhancing the visitor's experience and in general ensuring that we provide our Services in the best way that we can.
- To perform our obligations in accordance with any contract that we may have with you or in order to take steps to enter into a contract with you.
- We may also process your personal information in order to comply with any legal obligation imposed upon us.

## **5. How we store and secure information we collect**

All information is sent and stored on our secure servers or those of our trusted partners. Our partner's servers are either located within the European Union or in the United States (in which case they comply with the EU - U.S. Privacy Shield). We implement appropriate technical and organizational measures to protect your personal data against unauthorized or unlawful processing, accidental loss, destruction or damage.

Despite our best efforts, however, the transmission of information via the Internet is not completely secure and as such we cannot guarantee 100% security of your data transmitted to our server.

If you have selected to receive marketing emails from us, we keep your personal information for a reasonable period from the date you last expressed interest in our newsletters, such as when you last opened an email from us, according to the applicable EU and Greek legislation (more information on the retention period of your personal information can be found on **How long do we keep your personal information for**).

## **6. Who do we share your personal information with**

As a general principle, QIVOS does not share, sell, rent, trade or transfer any of the personal information collected by you, other than as described in this Privacy Policy.

Information collected through your use of our website and/or our Services may be shared with our trusted partners and other third-party service providers.

All our third-party service providers and trusted partners are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers and trusted partners to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **7. How long do we keep your personal information for**

We will retain your personal information only for as long as it is necessary for the fulfilment of the purposes for which they have been collected. In that regard, QIVOS will retain your personal information for a period of five (5) years upon our last



contact, unless as otherwise required in order to fulfil our contractual and legal obligations (such as in order to comply with a legal requirement as imposed by the applicable tax laws) or in order to comply with a legal claim.

In the event you no longer want QIVOS to use your personal information, you may request for their erasure (as described in Section 8 **Your rights**). In that case, we will no longer use your personal information for any purposes and will proceed to the erasure in accordance with the applicable EU and Greek legislation. QIVOS will retain your personal information for a period of one (1) month after informing you that it will proceed with the erasure. Please note that we may not be able to comply with your request for erasure and may further retain your personal information, if we are required to do so in order to comply with our legal obligations and/or satisfy our legitimate interests, in which case we will continue to implement the security measures and technologies in order to keep your personal information secure.

## 8. Your rights

For all the purposes of processing you have the following rights which can be exercised at any time:

- **Right to access** personal information held about you.
- **Right to rectify/correct** any inaccurate personal information is related to you.
- **Right to withdraw your consent** of the processing of personal data relied on consent, as mentioned in this Privacy Policy, such as email communications. For example, all email communications contain an opt-out / unsubscribe option.
- **Right to object** to processing of your personal information in which case we will stop processing your personal information unless we must due to legal claims.
- **Right to restrict** processing.

- **Right to delete** your personal information at any time.
- **Right to portability**, that is to request your personal information in a structured, commonly used format.

**You can exercise any of these rights using the following methods:**

- By sending us an email at [marketing@qivos.com](mailto:marketing@qivos.com)
- By using our contact form at <http://www.qivos.com/contact-us/>
- If you do not want to receive any further communication, you can withdraw your consent at any time by clicking the opt-out / unsubscribe option contained in every newsletter.

If you exercise any of the rights mentioned below, QIVOS will take all appropriate measures to respond to your request within one (1) month from submitting it, informing you via email about your request or the reasons QIVOS might not be able to comply with any such requests.

If you think that any of your rights is violated, you have the right to lodge a complaint with the supervisory authority. Since QIVOS is a Greek company, the supervisory authority is the Hellenic Data Protection Authority.

If you have any queries on your rights, please contact ([DPO@qivos.com](mailto:DPO@qivos.com)).

## **9. Changes to Privacy Policy**

We may change this Privacy Policy if we think it's necessary e.g. for legal reasons. In this case, we will update the Privacy Policy online and we'll email you to explain the changes. When we do, we will provide notice to you by publishing the updated version and revising the date at the top of this page. By continuing to use our services after any changes come into effect, you agree to the revised Privacy Policy.

## 10. Πολιτική Προστασίας Δεδομένων Προσωπικού Χαρακτήρα

---

Η QIVOS αναγνωρίζει την κρισιμότητα της προστασίας των δεδομένων προσωπικού χαρακτήρα των φυσικών προσώπων και της σύννομης και ορθής επεξεργασίας τους. Στο πλαίσιο αυτό, η QIVOS συμμορφώνεται με τις βασικές αρχές επεξεργασίας προσωπικών δεδομένων, σέβεται τα δικαιώματα των φυσικών προσώπων και διασφαλίζει ότι τα δεδομένα προσωπικού χαρακτήρα τα οποία έχει στην κατοχή της:

- Συλλέγονται για καθορισμένους, ρητούς και νόμιμους σκοπούς, όπως αυτοί αποτυπώνονται στο Αρχείο Δραστηριοτήτων Επεξεργασίας που τηρεί και που συλλέγονται έπειτα από συγκατάθεση του φυσικού προσώπου όπου απαιτείται.
- Υφίστανται επεξεργασία μόνο για τους σκοπούς, για τους οποίους έχουν συλλεχθεί ή/ και για νομικούς και κανονιστικούς λόγους ή / και για την προάσπιση του εννόμου συμφέροντος της QIVOS.
- Δεν υποβάλλονται σε περαιτέρω επεξεργασία πέραν του ορισμένου σκοπού.
- Είναι κατάλληλα, συναφή και περιορίζονται στα ελάχιστα απαραίτητα για τους σκοπούς επεξεργασίας.
- Υπόκεινται σε νόμιμη επεξεργασία σύμφωνα με τα δικαιώματα των φυσικών προσώπων, είναι ακριβή και επικαιροποιούνται, όταν απαιτείται και ειδικά πριν τη λήψη κρίσιμων αποφάσεων για τα φυσικά πρόσωπα.
- Δεν τηρούνται για χρονικό διάστημα μεγαλύτερο από αυτό που απαιτείται για το σκοπό της επεξεργασίας ή / και για τη συμμόρφωση της QIVOS με νομικές και κανονιστικές υποχρεώσεις.
- Διατηρούνται ασφαλή από μη εξουσιοδοτημένη πρόσβαση, απώλεια ή καταστροφή.
- Διαβιβάζονται σε τρίτους μόνο υπό την προϋπόθεση ότι εξασφαλίζεται επαρκές επίπεδο προστασίας αυτών.

Τα ανωτέρω τηρούνται από το σύνολο των εργαζομένων της QIVOS, καθώς και από τρίτους που εκτελούν εργασίες επεξεργασίας δεδομένων προσωπικού χαρακτήρα φυσικών προσώπων για λογαριασμό της.

Η QIVOS για να διασφαλίσει τα παραπάνω:

- Εφαρμόζει Σύστημα Διαχειρίσεως Προσωπικών Δεδομένων και Ασφάλειας Πληροφοριών που καλύπτει το σύνολο των δραστηριοτήτων του για την παρακολούθηση και τον έλεγχο της εφαρμογής της παρούσας πολιτικής, καθώς και την αξιολόγηση της αποτελεσματικότητάς της ως προς τη συμμόρφωση με το κανονιστικό πλαίσιο και τις βέλτιστες πρακτικές για την προστασία των προσωπικών δεδομένων.
- Εφαρμόζει διαδικασίες για την πλήρη ικανοποίηση των δικαιωμάτων των φυσικών προσώπων.

- Ενημερώνει με σαφήνεια τα φυσικά πρόσωπα σχετικά με την επεξεργασία των δεδομένων τους.
- Ενσωματώνει τις απαιτήσεις διαχείρισης δεδομένων προσωπικού χαρακτήρα σε όλες τις εταιρικές λειτουργίες και διεργασίες που σχετίζονται με την επεξεργασία τους.
- Έχει καθορίσει ρόλους και υπευθυνότητες που σχετίζονται με τη διαχείριση των δεδομένων.
- Παρέχει σαφείς οδηγίες στο προσωπικό και τους τρίτους που εκτελούν εργασίες για λογαριασμό της για την ασφαλή χρήση και διαβίβαση των δεδομένων σύμφωνα με το Σύστημα Διαχείρισης Προσωπικών Δεδομένων.
- Διασφαλίζει ότι η διαβίβαση δεδομένων σε τρίτους και η επεξεργασία από αυτούς για λογαριασμό της υλοποιείται σε συμμόρφωση με το κανονιστικό πλαίσιο για την προστασία δεδομένων καθώς και την παρούσα πολιτική.
- Σχεδιάζει, υιοθετεί και παρακολουθεί την εφαρμογή συστήματος δεικτών και στόχων για την ασφαλή και νόμιμη διαχείριση των δεδομένων.
- Επενδύει στη συνεχή κατάρτιση, ευαισθητοποίηση και εκπαίδευση των εργαζομένων της σε θέματα προστασίας δεδομένων προσωπικού χαρακτήρα καθώς και στη συνεχή βελτίωση της τεχνογνωσίας και τη διάχυσή της σε όλο το προσωπικό.
- Διαθέτει όλους τους απαιτούμενους πόρους για την αποτελεσματική εφαρμογή του Συστήματος Διαχείρισης Προσωπικών Δεδομένων.
- Έχει ορίσει Υπεύθυνο Προστασίας Δεδομένων (Data Protection Officer).
- Κοινοποιεί την παρούσα πολιτική σε όλο το προσωπικό και μεριμνά για τη συνεχή αναβάθμισή της, ώστε να επιτυγχάνεται η πλήρης συμμόρφωση με το ισχύον κανονιστικό πλαίσιο.

Η QIVOS δεσμεύεται για την αδιάλειπτη παρακολούθηση και τήρηση του κανονιστικού και νομοθετικού πλαισίου και για τη συνεχή εφαρμογή και βελτίωση της αποτελεσματικότητας του Συστήματος Διαχείρισης Προσωπικών Δεδομένων και Ασφάλειας Πληροφοριών.