

Privacy Notice

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This Notice describes how TEAMPLOY ETEPOPPYOMH ETAIPEIA, a limited partnership (eterórrythmi etairía) under Greek law, based in Piraeus, General Commercial Registry (G.E.MI.) No. 190075003000 and Tax ID (A.F.M.) 803122035 (“Teamploy”, “we”, “us”), collects, uses and otherwise processes personal data in connection with the Teamploy digital platform, our website and any related service (the “Platform”). It provides the information required by Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR) and Law 4624/2019. Capitalised terms not defined here have the meaning given in the General Terms of Use. The controlling language of this Notice is English; if we publish a translation in another language for your convenience, the English version prevails in the event of any discrepancy, without prejudice to your mandatory rights as a consumer under the law of the country of your habitual residence.

1. Who controls your data

Teamploy is the data controller for the data we process to operate the Platform.

- Name: TEAMPLOY ETEPOPPYOMH ETAIPEIA (limited partnership under Greek law)
- Registered office: 72 Kolokotroni St., 18535 Piraeus, Greece
- G.E.MI.: 190075003000 · Tax ID (A.F.M.): 803122035
- Privacy contact: privacy@teamploy.gr

2. Who this Notice covers

It covers data we process for: website visitors; Individuals who create or maintain a profile; Hospitality Professionals; Businesses that request or obtain access; Company Administrators, Hiring Managers and other Authorized Users; and anyone who contacts us or submits reports or complaints.

3. The personal data we process

We collect different categories of data depending on how you use the Platform:

- **Identity and account:** first and last name, email, phone, login credentials and account identifiers, your role.
- **Professionals’ profile:** profile photo, professional information, roles or specialisations, experience, availability, preferences, education or certifications, badges, ratings and activity history.
- **Business and corporate account:** company name or distinctive title, Tax ID (A.F.M.), G.E.MI. details, registered office and contact details, details of the legal or authorised representative, details of Authorized Users, representation documents.
- **Use of the Platform:** account usage, history of material actions, opportunities, expressions of interest and selections, reports, complaints and support, technical access and security data where required.
- **Communication and support:** content of emails and forms, support requests, queries and reports.
- **Communication and marketing preferences:** preferences for newsletters, offers and community communications; consent or opt-out.
- **Special categories of data (Article 9 GDPR):** we do not seek or require special categories of data. Please do not include them in profiles, communications or free-text fields. If you include them on your own

initiative, we will process them only to the extent strictly necessary, on the basis of your explicit consent (Article 9(2)(a)) or, where applicable, for the establishment, exercise or defence of legal claims (Article 9(2)(f)).

Whether providing data is mandatory or optional (Article 13(2)(e) GDPR). Providing identity and account data and, for Businesses, corporate identification and representation details, is necessary to enter into and perform the user agreement and to use the Platform's core functions. If you do not provide it, we will not be able to create or maintain your account or provide the relevant functions. Some data is provided optionally (e.g. optional profile fields or communication preferences); not providing it does not affect access to core functions but may limit certain features (e.g. improved matching or receiving updates).

4. Where we obtain data

We collect data from the following sources:

- directly from you, when you create or update an account or profile, contact us or use the Platform;
- automatically, from your use of the Platform (technical access and security data, action history);
- from third parties: in particular, for Authorized Users and representatives, their details may be provided to us by the Business to which they belong; we may also receive data from other Users or third parties in the context of reports, complaints or requests;
- from official or publicly accessible registers and supporting identification documents (e.g. representation documents, public G.E.M.I. data), to verify Businesses and representatives.

Where we obtain data about you from third parties and not directly from you, we provide the information in this Notice within a reasonable period and at the latest within one month, or at the time of our first communication with you or the first disclosure of the data, in accordance with Article 14(3) GDPR.

5. Why we use data — and the legal basis

We process data only where there is a legal basis under Article 6 GDPR and, where applicable, Article 9. The main purposes and corresponding legal bases are described below; the retention period for each purpose is determined on the basis of the criteria in Section 10.

- **Account creation, profile management and core functions.** We process your identity, account and profile data so that you can register, log in and use the Platform's core functions. The legal basis is performance of the contract with you or taking pre-contractual steps at your request (Article 6(1)(b)).
- **Verifying Business identity and the authority of Authorized Users.** We process corporate account, representation and identification data to confirm who is obtaining access and with what authority. The legal bases are performance of the contract (Article 6(1)(b)), compliance with a legal obligation (Article 6(1)(c)) and our legitimate interest in preventing fraud and unauthorised access (Article 6(1)(f)).
- **Publishing content, displaying profiles, expressions of interest and sharing details with the selected party.** We process your profile, opportunity and action data so that matching between Businesses and Professionals works and the necessary details are shared with the selected party. The legal basis is performance of the contract (Article 6(1)(b)).
- **Communications, support and complaint handling.** We process the content of your messages and requests in order to respond to queries, provide support and handle complaints. The legal bases are performance of the contract (Article 6(1)(b)) and our legitimate interest in responding effectively and documenting communications (Article 6(1)(f)).

- **Reports, complaints, abuse investigations and Trust & Safety actions.** We process relevant data to examine reports, investigate abuse and protect Users and the community. The legal basis is our legitimate interest in protecting the Platform, Users and third parties (Article 6(1)(f)) and, where applicable, compliance with a legal obligation (Article 6(1)(c)).
- **Security, prevention of fraud or abuse, and integrity.** We process technical data and logs to ensure the security, stability and integrity of the Platform. The legal basis is our legitimate interest in secure and reliable operation (Article 6(1)(f)) and, where applicable, compliance with a legal obligation (Article 6(1)(c)).
- **Tax, accounting and other legal compliance.** We process transaction and account data where required to issue documents and comply with our obligations. The legal basis is compliance with a legal obligation (Article 6(1)(c)).
- **Establishment, exercise or defence of legal claims.** We process data where needed to defend our rights or the rights of third parties before authorities and courts. The legal basis is our legitimate interest (Article 6(1)(f)) and, where special categories of data are involved, the necessity for legal claims (Article 9(2)(f)).
- **Direct marketing — newsletters, offers and community communications.** We may send you updates, offers and community communications only where you have given your prior consent. The legal basis is your consent (Article 6(1)(a) GDPR), which you may withdraw at any time.
- **Service improvement and analytics.** We process usage data, as a rule in aggregated or anonymised form where possible, to understand and improve the Platform. The legal basis is our legitimate interest in developing and improving the service (Article 6(1)(f)).
- **Ratings, reviews and system-generated badges.** We process activity data to provide reputation and trust signals that help Users trust the marketplace. The legal basis is our legitimate interest in a reliable and safe marketplace (Article 6(1)(f); see the relevant Legitimate Interests Assessment).

6. How we share data between Users

We share limited data between Users where required for operation: Professionals' profiles may be shown to relevant Businesses; corporate account details to Authorized Users of the same Business; and, after selection, the necessary contact details to both parties. We do not sell personal data and we do not publicly display Professionals' profiles outside the Platform without an appropriate legal basis.

7. When the Business becomes an independent controller

When a Professional expresses interest or a selection is made, we may disclose the necessary data to the relevant Business. Once the Business receives the data for its own purposes, it acts as an independent controller and is responsible for any further processing (see also the B2B Terms, Section 12). We are not responsible for subsequent processing outside our control, without prejudice to our own obligations regarding the initial disclosure.

8. Categories of recipients and processors

We may share data with the following categories of third parties where required. Where they act as processors on our behalf, they are bound by a contract that includes the safeguards of Article 28 GDPR. Upon request at privacy@teamploy.gr we provide further information about specific processors.

- **Cloud infrastructure and hosting providers:** hosting of the platform, databases and backups.
- **Email and productivity tool providers:** internal communication, collaboration, calendars.
- **Communications providers (email, SMS, mobile messaging):** sending transactional notifications and authorised communications.
- **CRM providers:** managing queries, support and relationships with Businesses.
- **Security, monitoring and backup providers:** information security, threat detection, business continuity.
- **Accountants, tax advisers, lawyers and consultants:** tax, accounting or legal support under confidentiality.
- **Public authorities, courts, regulators:** where required by law or to protect rights.
- **Acquirers, investors and their advisers (in a corporate transaction):** due diligence and transition, under confidentiality.

9. International transfers outside the EEA

Some providers may process or store data outside the EEA, or access it from countries outside the EEA. Where this occurs, we ensure appropriate safeguards under Chapter V GDPR — an adequacy decision (Article 45), Standard Contractual Clauses (Article 46(2)(c)) with any additional measures, or another permitted mechanism. As at the date of this Notice, our main providers (including hosting) are configured to process data within the EU/EEA. You may request a copy of the relevant safeguard at privacy@teamploy.gr.

10. How long we keep data

We keep data only for as long as necessary for the purposes for which it was collected, unless the law permits or requires longer retention or retention is necessary for the establishment, exercise or defence of legal claims. By way of indication, we apply the following criteria and retention periods:

- **Account and profile data:** for as long as your account is active and, as a rule, up to six (6) months after its closure, unless longer retention is required for any of the reasons below.
- **Activity history, ratings and badges:** for as long as the account is active and for a reasonable period thereafter, to the extent necessary for the integrity and reliability of the marketplace.
- **Tax, accounting and transaction data:** for the period required by tax and accounting legislation (as a rule, at least five (5) years from the end of the relevant financial year, and longer where the applicable limitation period is extended, under Law 4308/2014 and applicable tax legislation).
- **Communications and support requests:** for as long as necessary to handle and document the request and any follow-up, as a rule up to twelve (12) months after its resolution.
- **Operational logs:** application, deployment, access and error logs, including logs forwarded to Better Stack — up to thirty (30) days.
- **Security-incident logs:** up to twelve (12) months, where needed for investigation and protection.
- **Reports, complaints, Trust & Safety actions and security logs:** for as long as necessary to investigate and protect the Platform, Users and third parties, and to establish or defend claims.
- **Marketing consent data and records:** until you withdraw consent or object; we keep proof of consent/withdrawal for a reasonable period to document our compliance.
- **Data necessary for legal claims:** until the applicable limitation periods expire (which, under the Greek Civil Code, may be up to twenty (20) years, depending on the nature of the claim).

The above periods are indicative and are specified in our internal retention policy. On expiry of each period, we irrevocably delete or anonymise the data, unless another lawful basis for retention applies.

11. Your rights

Under the GDPR and Law 4624/2019 you have the following rights, subject to the conditions and limitations of the law. To exercise them: privacy@teamploy.gr; we respond within one month (Article 12), with the possibility of a two-month extension where necessary. We may need to verify your identity.

- **Access (Article 15):** confirmation of processing and a copy of the data and the prescribed information.
- **Rectification (Article 16):** correction or completion of inaccurate or incomplete data.
- **Erasure (Article 17):** deletion in the cases of Article 17; we may retain certain data for legal obligations or claims.
- **Restriction (Article 18):** suspension of processing in the cases of Article 18.
- **Portability (Article 20):** receiving the data in a structured, commonly used, machine-readable format and transmitting it to another controller, where processing is based on consent or contract and is automated.
- **Objection (Article 21):** objection to processing based on legitimate interest and to direct marketing at any time.
- **Withdrawal of consent (Article 7(3)):** where processing is based on consent, withdrawal at any time without retroactive effect.
- **No automated decision (Article 22):** not to be subject to a decision based solely on automated processing with legal or significant effects.
- **Complaint to the supervisory authority (Article 77):** lodging a complaint with the HDPa or the authority of your habitual residence, place of work or place of the alleged infringement.

Right to object (Article 21 GDPR): you have the right to object, on grounds relating to your particular situation, at any time to processing based on our legitimate interest (Article 6(1)(f)); in that case we will stop the processing unless there are compelling legitimate grounds that override yours or for the establishment, exercise or defence of legal claims. For processing for direct marketing purposes, you have the right to object at any time, free of charge and without justification, at privacy@teamploy.gr.

Competent supervisory authority for Greece: Hellenic Data Protection Authority (HDPa), 1-3 Kifisias Ave., 11523 Athens, tel. +30 210 6475600, complaints email complaints@dpa.gr (general contact contact@dpa.gr), website www.dpa.gr.

12. Automated decision-making and profiling

As at the date of this Notice, we do not make decisions based solely on automated processing (including profiling) with legal or similarly significant effects within the meaning of Article 22. The Platform may use automated functionality for display, notifications and operational matching, to support and not replace human decision-making (see also the General Terms of Use, Section 9). Please note that the main provisions of Regulation (EU) 2024/1689 (the Artificial Intelligence Act) apply on a phased basis, with most obligations applying from 2 August 2026. To the extent we use AI-supported features, we monitor and will comply with the applicable obligations (e.g. transparency) as they take effect, and we will update this Notice accordingly — in particular if we introduce an Article 22 automated decision.

13. Cookies and similar technologies

We use cookies and similar technologies (local storage, pixels, SDK identifiers) on our website and the Platform to operate the service, keep you logged in, remember your choices and keep the service secure. This section incorporates our cookie information; we do not maintain a separate Cookie Notice.

Who places them: at launch, cookies are placed only by Teamploy (first-party). We do not currently use third-party analytics, advertising/retargeting or social-media cookies. If this changes, we will update this section, add the relevant categories to the cookie banner and obtain your consent where required, before any non-essential technology is used.

The categories are described below. For the full, up-to-date list of individual cookies (name, provider, purpose, duration), see “Cookie settings” in the website footer or in the banner.

Category	Purpose	Duration (indicative)	Legal basis / status
Strictly necessary (in use)	Core operation, login/authentication, security (CSRF/anti-abuse), routing and load balancing, storing your cookie choices.	Session up to 6 months	No consent required — Article 4(5) of Law 3471/2006; legitimate interest / performance of contract
Functionality / preferences (not currently used)	Remembering settings and choices (e.g. language).	Up to 12 months	With your consent, where not strictly necessary
Analytics (not currently used)	Measuring usage and improving the service.	Up to 13 months	Only with prior consent — Article 4(5) of Law 3471/2006; Article 6(1)(a) GDPR
Advertising / marketing (not currently used)	Campaign targeting and measurement.	Up to 13 months	Only with prior consent — Article 4(5) of Law 3471/2006; Article 6(1)(a) GDPR

Management: you can block or delete cookies via your browser (blocking strictly necessary cookies may prevent parts of the Platform from working). When non-essential cookies are introduced, the banner will offer “Accept all”, “Reject all” and “Manage preferences” — with rejection as easy as acceptance — and you will be able to change your choices at any time via the “Cookie settings” link in the footer. Where consent is requested, we retain your choice for up to 6 months before asking again (and in any event no longer than 13 months), in line with supervisory-authority guidance.

14. How we keep your data secure

We apply appropriate technical and organisational measures under Article 32, e.g. access controls and role-based permissions, encryption in transit and, where appropriate, at rest, logging and monitoring, password security measures, backups and business continuity, as well as contractual safeguards with processors. In the event of a breach likely to result in a risk, we notify the HDPA without undue delay and, where feasible, within 72 hours (Article 33); if the risk is high, we also notify the data subjects without delay (Article 34).

15. Marketing communications

We may send newsletters, offers or marketing communications only with your prior consent, in accordance with the GDPR and Law 3471/2006. You can opt out at any time, free of charge, via the unsubscribe instructions in each message or at privacy@teamploy.gr.

16. Children's data

The Platform is intended for users at least 18 years old and we do not knowingly process data of persons under 18 in the context of registration. If you become aware that a minor has provided data without authorisation, please contact privacy@teamploy.gr and we will delete it without delay.

17. Changes to this Notice

We may update this Notice from time to time. Each new version is published on the Platform with an updated effective date and, for material changes, we will inform you by reasonable means (e.g. email or in-Platform notification).

18. How to contact us

For any matter regarding this Notice or to exercise your rights: privacy@teamploy.gr.