**Website Privacy Policy**

**1. Definitions**

"Personal data" means any information relating to an identified or identifiable natural person ("data subject"), is a natural person whose identity can be ascertained, directly or indirectly, in particular by reference to an identity item such as a name, identification number, location data, online identity card or one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

"Special Category Data" (Sensitive Personal Data) means data that is inherently particularly sensitive to the fundamental rights and freedoms of individuals and needs special protection, as the context in which they are processed could pose significant risks to fundamental rights and freedoms of individuals such as health data, data which discloses racial or ethnic origin, religious or philosophical beliefs or which concern the sexual life of a natural person or sexual orientation and so on.

"Processing" means any operation or sequence of operations performed with or without the use of automated means, on personal data or on personal data sets, such as the collection, registration, organization, structuring, storage, adaptation or alteration, retrieval, search for information, use, disclosure by transmission, dissemination or any other form of disposal, association or combination, restriction, deletion or destruction;

**2. Politics**

The Private Non-Profit Organization undertakes to collect and process your personal data in accordance with the provisions of Regulation (EU) 2016/679 (hereinafter "GCC"). The Private Non-Profit Organization as Head of Processing informs you about the way of collecting and processing information about you which is governed by the following terms and the relevant provisions of the GCP and the relevant current Greek and European legislation on personal data protection. Specifically, this Policy sets out the type of information that Private Non-Profit Organization may collect from you and informs you about how we use this information. When you voluntarily provide us with personal information, such as your name, address or e-mail address, we use this information in the strictest confidence. Subject to the specific provisions of this Policy, no personal information is the subject of rental, sale, public posting or disclosure to other companies, organizations or websites.

This Policy applies to the collection and use of your personal information by the Private Non-Profit Organization and applies, in general, to any natural person who accesses and uses the website https://www.eudaimoniamedical.com.

**3. What information do we collect from you?**

During the use of the Private Non-Profit Organization website, we collect the following Personal Data on a case-by-case basis, when you provide it to us:

 • Your personal information & Contact Information such as name, phone, email, address, etc.

 • Data that you include in your CV (level of education, qualifications, previous service, etc.) in case you apply for a job.

 • Financial Data when making a donation through a bank account. The Private Non-Profit Organization has access to general details of the financial transaction when you make credit card donations in the secure environment of Viva Wallet and in particular your contact details, the amount of the donation and the date of the transaction but does not store your credit / debit card data.

 • Data that you submit through the contact form with us, including the free text that you submit on a case-by-case basis.

 • Cookies Data: Through the browser cookies that you use during your navigation on our Website, in order to respond, promote and route your request accurately. In this case, we may collect information about the type of browser you are using as well as other data such as search history, IP address, screen resolution, browser you used, operating system and settings, access hours and your reference URL. If you use a portable device, we may also collect data that identifies your device, settings, and location. For more information about the cookies used by the Website, users are kindly requested to visit the Cookies Policy page.

**4. How do we collect your Personal Data?**

We collect your Personal Data in the following ways:

 A. Directly from you:

 • Through the online contact form

 • Through the online donation form

 • Via email.

 • Via telephone communication.

 B. By automated means through the use of the Website: When you visit the website of the Private Non-Profit Organization, we may collect data from you from browsing and using our services. This data may include search history, IP address, screen resolution, browser you used, operating system and its settings, access times, and your reference URL data collected through cookies (see cookies policy).

 C. From third parties: If you connect to or connect to https://www.eudaimoniamedical.com through a third party service (e.g. Facebook), the third party service may send us information such as registration information and profile from that service. This information is varied and controlled by this service or as authorized by you through your privacy settings on this service. Also to the extent permitted by applicable law, we may obtain additional information about you, such as demographics or fraud detection information, from third-party service providers and / or affiliates, and combine it with information about you.

**5. Use of Personal Data**

We use your Personal Data to respond to your requests in order to provide services, information and communication between us on issues that interest you and concern you, such as the actions of the Private Non-Profit Organization, ways of participation and offer etc. The purpose of this collection is to provide services that are available electronically and specifically:

 • The provision of services to you, and in particular for the provision of the services and / or information requested, the provision of information for services for which you have expressed interest and in general the response to customer service requests.

 • Communicating with you or responding to your requests.

 • The provision of seamless access and use of our website and enforcement

the terms of use of the website and other policies.

 • Transaction protection and security (to be able to detect and prevent cases of fraud, abuse, security incidents and other harmful activities and to conduct security investigations and risk assessments). In addition we can receive information on the commission of offenses if necessary for the protection of our legitimate interests, ie for the protection of our assets, our employees / associates. To ensure the compliance of the Private Non-Profit Organization with legal obligations:

 • The improvement of our services in order to control, troubleshoot and improve the functionality and quality of our website and in general the optimization and adaptation of our platform to your needs, making our website easier and more efficient to use

 • Compliance with legal obligations, such as for the protection of our legal rights before judicial or other authorities and for the fulfillment of the obligations of representation and compliance before supervisory / control authorities of the country and, if necessary, abroad.

**6. Legal Basis and Purpose of Use and Processing of your Personal Data.**

The Private Non-Profit Organization collects only Personal Data that is necessary in order to satisfy your requests in the context of our activity and its general operation. If and where additional, optional information is sought, you will be informed at the time of data collection. Under Greek and EU law (including the GCC), we process Personal Data, provided we have the legal basis to do so. Therefore, when we process your Personal Data, we rely on one of the following legal processing bases:

 • For the execution of the contract: When the processing of your Personal Data is necessary for the fulfillment and compliance of our contractual obligations (in the broadest sense).

 • When we have a legitimate interest: We may process data about you when we have a legitimate interest in carrying out a legitimate activity in order to ensure the continuity of that activity, as long as it does not affect your interests, such as your information about services and the actions of the Private Non-Profit Organization for which we have been asked for your information as well as for our news, the improvement of our services (better understanding your needs and expectations), the prevention of fraud, the security of our systems, ie the need to protect computers and communication systems and ensure that they work properly and are constantly being improved.

 • When there is a legal obligation: We are required to process your Personal Data to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or authority or complying with other regulatory, insurance, accounting or tax provisions.

 • When we have your consent: We may occasionally ask for your special permission to process some of your Personal Data, such as indications for sending updates, and the processing of your Personal Data will only be done in this way, if you agree to it. You can withdraw your consent at any time, by contacting the Private Non-Profit Organization at dpo@eudaimoniamedicalservices.com

The Association does not collect "sensitive" personal data through the website and advises users not to disclose specific category data through the website or the contact form provided on it.

**7. Social Media Share Button**

The Private Non-Profit Organization has official accounts on social media and specifically on Facebook, YouTube, Instagram and Twitter. On its website, the Private Non-Profit Organization incorporates a social media share button for Facebook, YouTube and Twitter, suggesting site visitors to follow the Private Non-Profit Organization in the respective media as well as to make posts and comments. During your transfer to the respective social media we may collect some of your data (such as your profile data on the respective media).

According to the case law of the European Court of Justice, the Private Non-Profit Organization is considered jointly responsible for processing your data along with the social media. In this context, the Private Non-Profit Organization has posted the Privacy Policy prominently on every social media site, strictly adheres to the obligations related to the protection of personal data by taking appropriate technical and organizational measures (such as restricting access to media management), in order to ensure the secure processing of data.

The purpose of the processing of the specific data is the projection and promotion of the image and services of the Private Non-Profit Organization, the provision of updates or the communication with you, responding to the messages / comments that you send us.

The legal basis for the processing is your consent which you provide with your positive energy to press the like or follow field on the social media of Private Non-Profit Organization. You can revoke your consent at any time in the same way as you provided it, by unliking or unfollowing.

The Private Non-Profit Organization is not responsible for the manner or means by which each social media site processes your data and it is your responsibility to be informed in accordance with the Privacy Policy of Facebook, YouTube, Instagram and Twitter.

Finally, while the Private Non-Profit Organization wishes and encourages the submission of comments by users on the posts and / or pages he maintains on social media, informs users that each post or comment should respect the basic rules of courtesy, decency and respect for the different point of view. Therefore, although the Private Non-Profit Organization is not obligated or able to control the content submitted by the users of these media, will make efforts to ensure a safe internet environment and will remove any content that is found to violate the terms of use of the website, such as abusive, pornographic, threatening content or that infringes intellectual property rights, while it may exclude users who violate the above terms. In any case, if you consider that content posted on the official account of the Private Non-Profit Organization on social media violates the terms of use, please contact us immediately.

**8. Recipients of Personal Data**

We do not disclose your Personal Data to third parties who are not affiliated with us, unless required by law to fulfill our functions and actions, in order to respond to your requests and / or if required or permitted by law or professional standards and / or if we have your explicit consent to this.

Also, your data, to the extent that it is appropriate for the fulfillment of our contractual obligations, your better service and the satisfaction of your requests, can be transmitted to specific recipients for the fulfillment of each of the above processing purposes and within the framework of responsibilities of each recipient, which may be:

 i. the competent employees and associates with any employment relationship of the Private Non-Profit Organization in the exercise of their duties

 ii. to the extent that this is expedient for the fulfillment of our contractual obligations, your better service and the satisfaction of your requests, can be passed on to collaborators with the Private Non-Profit Organization providers, such as companies providing legal, consulting and auditing services, IT companies, companies that provide internet services, or other services necessary for the operation of the website and the execution of the services of the Private Non-Profit Organization.

 iii. public authorities, such as supervisory authorities, tax authorities, judicial, public and independent authorities, police authorities, if this is absolutely necessary for the protection of legal rights or the fulfillment of obligations of the Private Non-Profit Organization.

It should be noted that during the registration, access and / or processing of the personal data of the user, the employees and added of the Private Non-Profit Organization fully comply with the provisions of the European General Regulation 2016/679 on Data Protection as well as with the current Greek legislation and jurisprudence regarding the protection of personal data. The Private Non-Profit Organization requires its employees, webmasters, and third-party affiliates to take all necessary technical and organizational measures (including appropriate policies and procedures to prevent the disclosure of personal data of its visitors / registered users-clients who process and possess and implement procedures for the management and processing of personal data in a lawful manner and protect them in accordance with the GIP.

**9. Transfers of Personal Data to Countries outside the EU and EEA.**

 The data is stored in databases located within the EU. However, it is possible to transfer Personal Data to third countries outside the EU and the EEA. When we transfer your Personal Data to third countries, we take appropriate steps to protect your Personal Data in accordance with this Policy and all applicable Personal Data Protection laws. If we need to transfer your personal data outside the EEA, we provide a similar degree of protection for them, ensuring that one of the following protection measures is implemented:

 • We will only transmit your personal data to countries that the European Commission considers to provide an adequate level of protection for personal data.

 • Where we use specific service providers in third countries, we reserve the right to use specific contracts approved by the European Union, which provide personal data with the same protection as in Europe (Standard Clauses or SCC).

 • Where we use providers based in the United States, we reserve the right to transmit data to them if they participate in the EU-US Privacy Shield Program, which requires them to provide similar protection for personal data shared between Europe and USA or we will use the standard clauses.

 • One or more of the derogations provided for in Article 49 of the GIP will apply.

**10. Network and Information Security**

The Private Non-Profit Organization implements all reasonable and appropriate technical and organizational security measures to protect your Personal Data against unauthorized access, misuse, loss or destruction. Such measures include, where appropriate, the use of firewalls, secure server installations, encryption, the implementation of appropriate access rights systems and procedures, the implementation of access control policies, the careful selection of processors, and the control of GPA and other reasonable organizational and technical measures for providing adequate protection of your Personal Data, which is updated taking into account technology developments and their implementation costs.

All employees are bound by confidentiality and confidentiality clauses and your Personal Data is processed only by specially authorized staff of the Association.

**11. Technical and Organizational Protection Measures**

The Private Non-Profit Organization has taken appropriate technical and organizational measures to safeguard and protect Personal Data with a view to the safe storage of Personal Data and to prevent accidental loss or destruction and unauthorized and / or unauthorized access to, use, modification or disclosure; their. Examples include:

 i) physical security measures such as access control and recording, security policies, implementation of secure file destruction measures, installation of security locks, etc.

 ii) electronic security measures such as encryption, pseudonymization, control of access of users of information systems, installation of security hardware and software, etc.

 iii) regular training and information of authorized users

regular adequacy checks of security systems.

Our data centers where your Personal Data are stored are located in Greece, where the data center of the Private Non-Profit Organization is located. and the backup storage location is located within the Private Non-Profit Organization in a place that has all the necessary security measures. Also stored data are in partner cloud service providers whose data centers are located in the European Union. From the backup, a second copy is created in encrypted form which is stored outdoors with all the security measures. If you need more information about protection measures you can contact dpo@eudaimoniamedicalservices.com

**12. Retention time of Personal Data**

 The Personal Data is retained for the period necessary to carry out and complete the processing purposes listed above, including the purposes of meeting legal, accounting or information requirements, and to meet your needs, both in physical file and in electronic form. The personal data we process is not retained for a longer period of time than is necessary to complete the processing purposes and any services directly related to it:

 a. in the case of providing a service for as long as is necessary for the completion of the service and for a period of up to 6 months from the completion of the specific service and at least for as long as it is defined by the respective legal (tax or other) obligation.

 b. In case you contact us or submit a request, your personal data is kept for as long as required for your service and for a period of 6 months after the end of the process.

In any case we have obtained your consent, your personal information is kept until you object to the processing and / or revoke your consent. Withdrawal of consent shall not affect the lawfulness of the proceedings based on consent in the period prior to its withdrawal. To revoke your consent you can send a message to dpo@eudaimoniamedicalservices.com.

We will also retain personal data:

 • to the extent required by law (for example, in order to comply with tax legislation)

 • in order to comply with litigation (any ongoing or future litigation). In the event of a legal dispute between us, we will keep your data at least until the end of the court case with an irrevocable court decision.

 • to ensure, exercise or defend our legal rights, the personal safety of its users and the public.

After the end of the retention period, the Personal Data are destroyed by the physical archive and the information systems of the or anonymize them so that you can no longer be identified by them.

Nevertheless, some necessary personal data concerning your transactional relations with the Private Non-Profit Organization as well as updating or legally obtaining consent (if required) for the processing of your data, may remain as information for the user-client to ensure the proof of the legality of the processing of its data by the Association and to ensure legal claims of the parties.

**13. Your Rights regarding the processing of Personal Data**

Under the GCC (Articles 12-22) you have the following rights:

* Request a copy of your Personal Data.
* Withdraw your consent when this is the legal basis for the processing of your Personal Data.
* Request the correction of your Personal Data if it is inaccurate.
* Request the deletion of the Personal Data you have provided, subject to the law.
* Request the restriction of processing, subject to the law.
* Request the portability of your Personal Data, as long as you provide the data yourself, the processing is based on consent or the execution of the contract and the processing is automated.
* Oppose on some form of processing of your Personal Data by us.

To exercise the above rights, you can contact the e-mail: dpo@eudaimoniamedicalservices.com or by post or in person at A.M.K.E. at the address 24 Kavetsou, 81100, Mytilene, Lesvos. In case of exercise of one or more of the above mentioned rights, we take every possible measure to satisfy the request, within a reasonable time, but no later than one (1) month from the submission of the request and its identification. This deadline can be extended by a maximum of two (2) more months, if the request is complex or there is a large number of requests. The to maintain the minimum necessary Personal Data, in order to safeguard its legal interests.

Finally, every customer / user has the right to submit a query to the Private Non-Profit Organization for the way of processing and protection of his Personal Data, and if he considers that some right thereof is violated, he has the right to complain to the Personal Data Protection Authority (http://www.dpa.gr/, 1-3 Kifissias, PC 115 23, Athens, 210 6475600, E-mail: complaints@dpa.gr).

**14. Minors**

The Private Non-Profit Organization is committed to protecting the privacy of minors. Please note that the content and services of this Website are not intended for children under 15 years of age. Personal Data must not be submitted to the Private Non-Profit Organization either through the Website or otherwise, by persons under 15 years of age. If it comes to our notice that a person under the age of 15 has submitted Personal Data to the Private Non-Profit Organization, without the explicit consent of the parent, we will delete immediately, after relevant information or request, the said data in accordance with the deletion policy of the Private Non-Profit Organization.

**15. Changes in the Privacy Policy**

The Private Non-Profit Organization may modify this Policy. Please check the Implementation Date at the beginning of the Policy to see when it was last revised. Any revisions will take effect as soon as we post the revised Policy. If we make substantial changes to this Policy that extend our rights to use the Personal Data we have already collected from you, we will notify you and give you the option to use this data in the future.