

Cookie Policy:

Cookies are small text files that contain information stored in your computer's web browser and can be removed at any time. They can help us identify your computer the next time you visit our site or enable some features on our web pages. This platform uses cookies and similar technologies to ensure secure operation, user authentication, analytics, and communication functionalities. By using cookies, the Company can provide services that would not be possible without them. Users can delete cookies from their browser, but also disable them.

Cookies are classified in the following categories:

- a. Strictly Necessary Cookies, required for authentication, security, load balancing, and account access. These cookies are essential for the operation of the website and cannot be disabled.
- b. Analytics Cookies, used to understand how users interact with the platform (aggregated statistics). These cookies collect information about how visitors use the website (e.g. number of visits, pages viewed). Analytics data may be transferred outside the European Economic Area (EEA), including to the United States, based on Standard Contractual Clauses (SCCs) approved by the European Commission.
- c. Functional Cookies, enable platform features and user preferences.
- d. Marketing Cookies, used only where applicable and solely after user consent.

These cookies are used to deliver personalized advertisements and measure advertising effectiveness.

Legal basis

- a. Necessary cookies: Article 6(1)(b) & 6(1)(f) GDPR
- b. Non-essential cookies: Article 6(1)(a) GDPR (consent)

Third-party providers (indicative)

- a. Cloud infrastructure & hosting providers
- b. Analytics providers (e.g. Google Analytics 4)
- c. Messaging & notification services

d. Payment service providers

All third parties act either as Data Processors or independent Controllers and are contractually bound by data protection obligations.

We and our partners store and / or access information on a device, such as cookies, and process personal data, such as unique identifiers and standard information sent by a device for personalized ads and content, measurement of ads and content, and views for product development and improvement.

With your permission, we and our partners may use accurate geolocation and authentication data by scanning devices. You can click to consent to the editing by us and our partners as described above. Alternatively, you can access more detailed information and change your preferences before consenting or refusing to consent. Please note that some processing of your personal data may not require your consent, but you have the right to refuse such processing.

Your preferences will only apply to this site. You can always change your preferences by returning to this site or visiting our privacy policy. If you do not want cookies, you have the following options: Change your browser settings to delete or prevent cookies from being stored on your computer or mobile device without your express consent. The “help” section in your browser will provide you with information on how you can manage your cookie settings. In any case you may modify or withdraw your consent at any time via Cookie Settings.

International transfers

Where data is transferred outside the EEA, appropriate safeguards are applied, including Standard Contractual Clauses (SCCs) or adequacy decisions.

Privacy Policy:

A. Introduction

1. The privacy of our website visitors is very important to us, and we are committed to protecting it. Our policy explains how we will use your personal information.
2. Your consent to the use of cookies in accordance with the terms of our policy during your first visit to the website, allows us to use cookies every time you visit our website. As an Editor we process the data required to obtain and use the Services offered for your browsing of our website and for the purposes described in detail here in this Policy. With a commitment to legality and transparency, we manage with absolute respect the personal data communicated to it and the processing operations are kept to a minimum and only for the fulfillment of their purposes. Any processing operation is done in accordance with the General Regulation for the Protection of Personal Data 2016/679 / EU, Law 4624/2019 and in general the current national and European legislative and regulatory framework for the protection of personal data.
3. By using this Website, you acknowledge that you have read and understood this Policy. Where required by law, processing is carried out only after obtaining your valid consent.
4. In relation to messaging and communications services provided through the InfoBee platform, InfoBee IKE acts primarily as a Data Processor on behalf of its business customers, who act as Data Controllers for any personal data contained in communications transmitted through the platform.

CONTACT DETAILS:

InfoBee IKE

El. Venizelou 7, 2nd Floor, PC 38221

Volos, Greece

EL GEMI: 187934944000

B. Collection of personal information and identification data

The following types of personal information may be collected, stored, and used:

1. Information and authentication data about your computer including your IP address,

your geographical location, the type and version of your browser, and your operating system, device identifiers and log files.

2. Identification information and data about your visits and use of the site including external source, visit duration, page views and navigation path to the site.

3. Identification information and data such as your email address, which you enter in a relevant field on the website or telephone number submitted through forms or communications.

4. Information and identification data that you enter when creating your account on our website or for your communication with us through the corresponding form on our website — such as, with reference to and non-limitation, your name, telephone number of your staff, your profession, job title, your company name, your business name, your business address, your business landline number, information about your main or secondary business, and related business information, general information about employment either yours or your company or the company you represent.

5. Information, such as your name and email, which you enter when setting up your subscriptions and for sending emails and / or newsletters.

6. Identification information and data that you enter when using services on our website.

7. Information that arises when using the website, such as when, how often and under what circumstances you use it.

8. Identification information and data related to the services you use and the transactions you make on the website, which include your name, address, telephone number, your email address and your credit card information.

9. Information you post on the site with the intent of posting on the web, which includes your username, your profile information, and the content of your posts.

10. Information contained in any of your communication with us via email or through the website, including communication content and metadata.

11. Any other personal information you send us either voluntarily or upon request.

12. Billing & transaction data

13. Technical & security data

Before disclosing any personal information to any third party, you must have the express consent and consent of that person regarding the disclosure and processing of his or her personal information in accordance with this policy. We hereby acknowledge that in the event of your transfer of personal data to third parties, the Company considers it reasonable and reasonable that their consent has been validly obtained by you and you acknowledge that we assume no liability in the event of a breach of any third party rights. You expressly undertake in advance the recognition and redress of any damage, costs, expenses incurred by the Company and the payment of reasonable compensation to the Company, in case of violation of the terms hereof.

C. Use of your personal information

The personal information submitted to us is used for the purposes set out in this policy on the relevant pages of the website. We may use personal information for the following purposes and on the following legal bases:

1. Managing our website and business. Operation and administration of the Website and our business.
2. Customer support and communication (contract / legitimate interest).
3. Personalized site layout for you.
4. Enable the use of your available services on our website.
5. Providing services that you buy through our website and performance of contracts.
6. Sending transactions, invoices and payment reminders to you, as well as collecting payments from you and in general for tax purposes (e.g. Invoicing, accounting, tax compliance, concluding service contracts, cooperation agreements, invoicing, for extrajudicial or judicial actions to collect your debts to the company resulting from a contract).
7. Financial information.
8. Send non-advertising communications or notifications via email, or by phone regarding your requests.
9. Send our newsletter via email if you have requested it (you can let us know at any time if you no longer want the newsletter).

10. Sending promotional communications, related to your business or to specific third party companies that we believe may be of interest to you, through notifications or, upon your consent, by email or similar technology (you may notify us at any time if you no longer want advertising communications).
11. Providing statistical data of our users to third parties (which will not be able to identify any user of this information).
12. Manage requests and complaints that you have submitted or are related to your site.
13. Maintain the security of the site and prevent any fraudulent, malicious attack.
14. Confirmation of compliance with the terms and conditions of our website (including the monitoring of personal messages circulated through our private online messaging service).
15. Marketing communications, where permitted, on the basis of consent or legitimate interest in accordance with applicable law.
16. Security, fraud prevention and system integrity.
17. Compliance with legal and regulatory obligations and
18. Other similar and related or even deriving from the services provided by us.

If you submit personal information for publication on our site, we will post or use this information after we obtain your permission to do so. Your privacy settings can be used to restrict the posting of your information on our site and can be configured using the site privacy check. We will not pass on your personal information to any third party or any third party commercial department without your consent. We will not process your personal data without your consent. However, we reserve the right, in exceptional cases, to process your personal information and / or identification data to the extent permitted or required by law, and / or by court decisions or prosecutorial orders.

Platform & Messaging Data

InfoBee IKE provides a communications platform that enables its Customers to transmit messages to end recipients. InfoBee IKE does not initiate such communications, does not determine their content, and does not select or control the recipients of such communications.

Any personal data contained in messages transmitted through the InfoBee platform is processed solely on behalf of the Customer, who acts as the Data Controller and is solely responsible for the lawfulness of processing, including obtaining valid end-user consent and compliance with anti-spam and telecommunications regulations. InfoBee IKE acts exclusively as a Data Processor and processes such data only in accordance with the Customer's documented instructions and applicable data protection laws.

D. Disclosure / transmission of personal information

We may disclose your personal information to any of our employees, executives, insurers, or professional consultants, representatives, suppliers or subcontractors and authorised personnel in general, as required for the purposes set forth in this policy.

We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our controlling portfolio company and its affiliates, Professional advisers, auditors and insurers, IT service providers, hosting providers, and technical partners, Mobile Network Operators and international aggregators acting as sub-processors for message delivery,) as required for the purposes set out in this policy.

We also may disclose your personal information to any Public authorities, courts or regulators where required by law.

All recipients are bound by confidentiality and data protection obligations. We do not sell personal data.

We can share your personal information or identification data:

1. to the extent required by law
2. in relation to any current or future legal proceedings
3. for the purpose of consolidating, exercising or defending our legal rights (including the provision of information to third parties with a view to preventing fraud and reducing credit risk)
4. to the buyer (or potential buyer) of any good of the business that we sell (or intend to sell); and
5. for any other lawful purpose we believe may apply
6. to the court any other competent authority regarding the disclosure of information in

the event that we consider that the relevant authority will require the disclosure of such personal information.

Also as stated in this policy, we will not provide your personal information to third parties without your prior consent. Personal data may be passed on to partners, or third parties, in compliance with the terms of this Policy and committed to confidentiality, who act on our behalf for further processing for the purpose of providing services, data management and technical support, only, after being informed in advance and giving your consent. These third parties have contractually undertaken with the Company, that they will use the personal data only for the above reasons, and will not transmit personal information to third parties, as well as will not disclose it to third parties unless required by law.

E. International data transfers

1. The information we collect may be stored, processed, or even moved between any countries in which we operate so that we may use or process it in accordance with the terms and conditions of this policy.
2. The information we collect may be transferred to the following countries which do not have the same personal data protection legislation as that applicable in the European Economic Area: the USA, Russia, Japan, China and India.
3. The personal information you post on our website or submit to our website may be available online worldwide. We cannot prevent the use or misuse of such information by third parties and we disclaim any liability, civil or criminal, to any degree in these cases.
4. You expressly and unreservedly agree to the transfer of provisional data described in this section.

F. Preservation of personal data

1. This Section describes InfoBee's data retention and preservation practices, which are designed to ensure compliance with applicable data protection laws, including the GDPR principles of storage limitation (Article 5(1)(e)) and integrity and confidentiality (Article 5(1)(f)).
2. Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable legal or regulatory obligations. InfoBee implements appropriate technical and organisational measures to protect personal data

against unauthorised access, loss, or destruction, in accordance with Article 32 GDPR.

3. The retention period can vary significantly depending on the type of data and how it is used. Determining the retention time of data is based on criteria such as legal retention periods, pending or potential disputes, intellectual property or rights, contractual requirements, business instructions or archiving needs. We undertake to keep in accordance with the terms and conditions hereof the personal data and data that you provide to us for a period of up to three years (3) years from the moment of their proper receipt by us, unless a longer period is required by law or contractual obligations. After the expiration of the aforementioned time period, or the expiration of the longer required period, from the time of receiving the data, all personal data will be deleted. Tax records are maintained in accordance with tax legislation. For processing purposes related to the performance of our contract and keeping you informed about our services, we retain your personal data for as long as our commercial relationship remains active, and thereafter only for as long as required by applicable law. In any case we will keep documents (including electronic documents) that contain personal data: a. to the extent required by law, b. if we consider that the documents can be related to any legal procedure in force and c. for the purpose of consolidating, exercising or defending our legal rights (including the provision of information to third parties for the purpose of preventing fraud and reducing credit risk).

G. Security of your personal data

We are in constant control to ensure the safe and unhindered use of the website for its users, free from possible malware (e.g. viruses) and possible arbitrary access to users' personal information. We implement appropriate technical and organisational measures aligned with GDPR standards to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. However, transmission of information over the internet is inherently insecure and we cannot guarantee absolute security. As there is no sound security system, we cannot fully guarantee that our efforts each time will be completely successful, in terms of its website and hosting provider. In this regard, we are not responsible for any loss or damage that may occur to a user as a result of its unsuccessful efforts, and it is pointed out that the user is obliged to take all necessary security measures and protection of the system and his account. However, all its prevention, suppression and information measures are harmonized with the General Data Protection Regulation (EU) 2016/679 and Directive (EU) 2016/680 and the relevant

national legislation as mentioned above.

Finally, these terms of protection of Personal Data may be reviewed and updated at any time and without notice, and the Company undertakes to inform users of any change through this website. The users of the website are kindly requested to check these terms at regular intervals for any changes, as the continuous use of the website implies that they unconditionally accept all possible modifications thereof.

We take the necessary precautions at the technical and organizational level and constantly and continuously make technical upgrades of our programs and systems to prevent loss, misuse, or deterioration in any way, whether by external intervention of a third party or by technical or mechanical failure, of your personal data.

- All personal data you provide is stored on secure (password protected – and firewall) servers.
- All electronic money transactions on our site are protected by our encryption technology.
- You acknowledge that the transmission of information over the Internet is inherently insecure and that we cannot guarantee the security of data transmitted over the Internet.
- You are responsible for maintaining the confidentiality of the password you use; we will not ask for your password (unless you log in to our site).

H. User Rights

All data subjects have GDPR rights, including access, erasure, restriction, portability, objection, and the right to lodge a complaint with the Hellenic Data Protection Authority. All data subjects have control over the processing of your personal data. We are committed to upholding your privacy rights for all users. Specifically, you are guaranteed the following rights regarding your personal data, which are provided in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR) 2016/679 where applicable:

- The right to transparent information, communication and arrangements for the exercise of your rights (Article 12, 13, 14 GDPR), i.e. your right to be informed about how your personal data is used (as detailed in this Privacy Policy).
- Right of access (Article 15 GDPR) to the personal data we have collected from you. You

have the right to request from us, at any time, copies of your personal data. There are some exceptions, which means you may not always receive all the information we process. You can read more about it in Articles 12 and 15 of the GDPR.

- The right to correct (Article 16 GDPR) the inaccurate personal information we have about you. You have the right to ask us, at any time, to correct the information that you consider to be inaccurate. You also have the right to request the completion of information that you consider incomplete. You can read more about it in Articles 12, 15 and 19 of the GDPR.

- Right to delete (“right to be forgotten”) (Article 17 GDPR) the information we have about you. You have the right to ask us to delete your personal data in certain cases. To request the deletion of your data, please contact us at legal@infobee.com. We extend this right to all our users, regardless of their location. While this right is recognized by regulations such as Article 17 of the GDPR, our commitment to your privacy ensures this right is available to everyone.

- The right to restrict the processing of your personal data (Article 18 GDPR). You have the right to ask us to restrict the processing of your information in certain cases. You can read more about this right in Articles 18 and 19 of the GDPR.

- Right to the portability of your data (Article 20 GDPR), i.e. the right to transfer your data either to you or to another service provider. This only applies to the information you have given us. You have the right to request that we transfer the information you have given us to another organization or that we give it to you. The right only applies if we process information based on your consent, or contract and processing is automated.

- Right of objection (Article 21 GDPR) to the processing of your personal data. You have the right to object to the processing of your personal data. You can read more about this right in Article 6 of the GDPR. You have the right to request a restriction on the processing of your personal data in the following cases:

- When you question the accuracy of your personal data and until the Company verifies their accuracy.

- When the processing of your data is illegal and you oppose their deletion, asking instead to limit their use.

- When the Company no longer needs your personal data for the purposes of processing,

but this data is necessary for you to establish, exercise or support legal claims.

-When you object to the processing of your data by the Company based on the legal interest of the latter and until the existence of the illegal reasons of the Company that prevail over your freedoms or rights is verified.

- Right to revoke your already given consent (Article 7 GDPR), i.e. to withdraw your consent at any time for processing based on the consent. The legality of the processing of your data is not affected by the withdrawal of consent until the time at which you requested the revocation.
- The right to make a complaint to the competent supervisory authority, Hellenic Data Protection Authority (Kifissias 1-3, PC 115 23, Athens, Greece, +30-210 6475600, contact@dpa.gr).
- You may request at any time to cease processing your personal information for advertising purposes.

I. Clarifications regarding your rights

You may exercise your data protection rights free of charge. We will respond to your request without undue delay and in any event within one (1) month of receipt, in accordance with Article 12 GDPR.

To submit a request or obtain further information about your rights, please contact us at legal@infobee.com.

If you consider that your request has not been handled appropriately, you have the right to lodge a complaint with the competent supervisory authority (in Greece, the Hellenic Data Protection Authority) and to seek an effective judicial remedy.

Please note that where requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may charge a reasonable fee or refuse to act on the request, as permitted under Article 12(5) GDPR.

J. Submission of a Complaint

If you believe that the processing of your personal data infringes applicable data protection law, you may contact us at legal@infobee.com, and we will make every effort to address your concerns. You also have the right, at any time, to lodge a complaint with

the competent supervisory authority. In Greece, this is the Hellenic Data Protection Authority (HDPa).

K. Modifications

We may update our policy from time to time by posting a new version on our website. Feel free to review our pages from time to time to ensure you have read the latest changes to our policy. We may notify you of changes to our policy via email or through a private messaging system on our website.

L. Third party sites

Our site includes hyperlinks to, and information from third party sites. We cannot control and take no responsibility for the protection policies and practices of third parties.