

# Privacy and Cookie Policy

This version of our Privacy Policy was last updated 14/11/2019.

## **Your rights, your information and how we use it.**

We recognise that when you visit our website and provide us with personal information, you trust that we will act responsibly and keep your information secure and confidential.

This privacy notice sets out the basis on [which any personal data we collect from you or that you provide to us when you use or interact with our website will be processed.

It is important that you read this notice, together with any other privacy notice or policy we may provide on specific occasions when we are collecting or processing personal information. *Our Privacy Policy contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information you have given us.*

Genia Collection is committed to safeguarding your personal information. Whenever you provide personal information to us, we are legally obliged to use it in accordance with all laws concerning the protection of personal information (we refer to these laws collectively in this privacy notice as the “data protection laws”).

We may need to make changes to our Privacy Policy; so please check our website for updates from time to time. If there are important changes such as changes to where your personal data will be processed; we will contact you to let you know.

## **What information will we collect about you?**

Personal data, or personal information, means any information about an individual from which that individual can be identified.

We may collect, store, and use the following categories of personal information about you:

- Identity and contact details such as your name, title, billing address, delivery address, email address and telephone number.
- Financial and transaction data, details about payments to and from you and other details of products you have purchased from us.
- Usage and technical data about how you use our website including data about your browsing actions and patterns.
- Marketing and communications data.

We collect this information when you register on our site or when you submit a request form. Without your permission, we will not disclose information about your visits to our website – or any other personal information that you may give us – to any third parties.

We do not collect any special categories of personal data about you (for example, details about your race or ethnicity, religious or philosophical beliefs, political opinions or information about your health).

### **How will we collect and use your personal information**

We use different methods to collect data from and about you including through:

- When you provide it to us e.g. by contacting us on our website.
- Direct interactions. You may give us your personal information when corresponding with us by post, phone, email or otherwise.
- When you use our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also use analytics services providers such as Google.

### **How will we share and disclose your personal information?**

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another lawful basis for doing so.

We may need to share your personal information with the following parties for the relevant purposes set out above:

\* Our service providers supplying IT, e-commerce and system administration services and other technical IT services including data analytics.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Where the third parties we use are data controllers in their own right (for example, the payment processors we use) then they will be required to comply with data protection laws.

### **Information we collect and our purposes for using your personal data**

We have set out below a description of ways in which we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Your personal data may be processed for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

## When you visit our website

- Web server log information

We use a third party server to host our website called easy.gr, the privacy policy of which is available here: <https://easy.gr/el/personal-data>.

**Lawful basis for processing:** Our legitimate interests of the General Data Protection Regulation

**Legitimate Interest(s):** We and our third party hosting provider have a legitimate interest to ensure network and information security when processing your information.

## Using the contact form via our website

- Your name
- Contact details (address ,email, phone)
- Any other Information provided to us when you complete the contact form.

**Lawful basis for processing:** Our legitimate interests of the General Data Protection Regulation

**Legitimate Interest(s):** Responding to any requests or enquiries submitted by you and keeping records of correspondence

**Lawful basis for processing:** Necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary:** Where your message relates to us providing you with our services or taking steps such as providing you with information about such services at your request, we will process your information to enable us to do so

## Contacting us by Phone

- Phone number
- Any Information provided during your conversation with us.

**Lawful basis for processing:** Our legitimate interests of the General Data Protection Regulation

**Legitimate Interest(s):** Responding to any requests or enquiries submitted by you and keeping records of correspondence

**Lawful basis for processing:** Necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary:** Where your message relates to us providing you with our services or taking steps such as providing you with information about such services at your request, we will process your information to enable us to do so

### **Contacting us by Email displayed on our website**

- Email address
- Any other Information provided such as your name, telephone number and any information contained within any signature block in your email.

**Lawful basis for processing:** Necessary for our legitimate interests (to run our business) To take steps to enter into dialogue or contract with you (such as providing accommodation services)

**Legitimate Interest(s):** Responding to any requests or enquiries submitted by you and keeping records of correspondence

**Lawful basis for processing:** Necessary to perform a contract (such as providing accommodation services) or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary:** Where your message relates to us providing you with our services or taking steps such as providing you with information about such services at your request, we will process your information to enable us to do so

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- For administrative and business purposes in need to perform the contract we are about to enter into or have entered into with you.
- where we have your consent;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
- where we are required to comply with a legal or regulatory obligation.

### **International Transfers**

Some of our external third parties, might be based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **Cookies**

Our website uses cookies to distinguish you from other users of our website. Cookies are data files which are sent from a web browser to record information about users. This information may include information relating to your use of our website, information about your computer such as the computer's IP address and browser type, demographic data and, if you arrived at our website via a link from a third party site, the URL of the linking page. If you are a registered user this may include your name and e-mail address for verification purposes.

We use cookies for various purposes which may include:

- identifying returning users;
- enabling you to move around our website more easily;
- tracking your use of our website to better develop our website in accordance with your requirements;

You can reject some or all of the cookies we use from your hard drive at any time. This will mean that in doing so may impair your ability to use our website or some or all of its features. For further information about cookies please visit [www.allaboutcookies.org](http://www.allaboutcookies.org) or see our cookies policy.

We may use Google Analytics to help us learn about who visits our website and what pages are being looked at. Also Google Maps, use cookies. Google may also transfer this information to third parties where required to do so by law or where such third parties process the information on Google's behalf. You may refuse the use of cookies by selecting the appropriate setting on your browser, however please note that if you do this you may not be able to use the full functionality of our website.

For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

## **How long will we keep your personal information?**

### **Retention periods**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

**Correspondence and enquiries:** We will retain your information whether contacted by email, contact form or by phone until we have responded to or resolved your enquiry and for 12 months after which point we will delete your information

**Server log information:**  
logs for [12] months

We retain information on our server

In some circumstances you can ask us to delete your data: see section below for further information.

### **How we secure your personal information**

We have put appropriate technical and organisational security measures in place to protect your personal information from being, accessed, altered, disclosed, used in an unauthorised or unlawful way, accidentally lost or destroyed including:

- restricting the sharing and providing of access to your information to the minimum extent, considering all appropriate confidentiality restrictions.
- using secure servers to store your information
- prior to access being granted to your information attaining verification for the identity of any individual who requires access.

We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Your data protection rights**

Under certain circumstances, subject to certain limitations on certain rights you have the following rights under Data Protection Legislation in relation to your personal data. These include the right to:

- request access to your personal information;
- request correction or deletion of your personal information;
- object to processing of your personal data;
- request restriction of processing your personal information;
- request transfer of your personal data; and
- withdraw your consent to use your information

To exercise any of the above rights please contact us using the details in our “contacting us” section below.

The Act gives you the right to access information held about you generally you will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, Your right of access can be exercised in accordance with the Act.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Changes to our privacy notice**

We reserve the right to update this privacy notice at any time, and where we make minor changes to our Privacy Policy we will provide you with a new privacy notice when we make any substantial updates. Where we make major changes to our Privacy Policy or intend to use your information for a new or different purpose than the purpose in which we originally collected it, we will notify you by email or by posting a notice on our website.

If you have any questions about this privacy notice, please let us know using the “Contacting us” details below.

### **Contacting us**

Our full details are:

Genia Collection  
34 Theseos st. Chalandri, Athens  
Phone: +30 210 6890 636  
Email: [info@geniacollection.gr](mailto:info@geniacollection.gr)