

## PERSONAL DATA PROTECTION POLICY

### General

White Pearl Villas are owned by the company «ΕΠΕΝΔΥΣΕΙΣ ΑΚΙΝΗΤΩΝ ΕΝΕΡΓΕΙΑΚΗ ΑΕ», and is responsible for processing the personal data that you provide, in the context of trade cooperation with the company. White Pearl Villas, are committed to protect the personal data of the visitors / users of the [www.whitepearlvillas.com](http://www.whitepearlvillas.com) website and to comply with the relevant provision on the protection of personal data as they apply. White Pearl Villas do not collect information on visitors' / users' personal data unless they are provided voluntarily. Data collected from White Pearl Villas are those required and used only for the purposes for which they are collected, excluding any other non-desired use thereof. No personal data is required to navigate at the [www.whitepearlvillas.com](http://www.whitepearlvillas.com) site or to access its content.

### Introduction

The current Policy imprints and describes the Data Protection Management System and comprises the basic data protection principles that the company must provide to all users involved (internal and external partners). Additionally, White Pearl Villas constantly provide the necessary resources for the proper implementation of the Policy, by all departments, systems, company users, services, as well as any related activities.

### How are your rights being protected?

White Pearl Villas implement an information security management system to ensure the confidentiality and security of your data and protect them against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access and all other unlawful forms of processing. This information is provided in accordance to Regulation (EU) 2016/679 of the European Parliament, the European Council and the provisions of the Greek legislation on the protection of personal data adopted and applied in this context.

### Which data do we process?

Your personal data processed by White Pearl Villas may be:

- Identity or passport information such as name, surname, nationality.
- Contact details, such as phone number, address, email.
- Booking information such as date of arrival and departure, room number.
- Data relating to the procession of financial transactions such as credit – debit card number, bank account number, Tax Registry number and professional status.
- Flight details or shipping details.
- Dietary habits and peculiarities such as allergies, intolerances or specific diets.
- Photos and video for republication in social media and the blog that exists on our website [www.whitepearlvillas.com](http://www.whitepearlvillas.com).
- Copy of identity or passport and credit – debit card for identification purpose in cases of remote payments.

### Why do we collect Personal Data?

The above-mentioned information and personal data that White Pearl Villas collect from you will be stored in the Company's databases and servers, always in accordance with the provisions of the current legislation, particularly with those concerning the protection of the privacy of communications and the protection of the person itself from the processing of personal data.

The White Pearl Villas explicitly declare that this data will not be shared, in any case, with third parties unless it is ordered differently by law or court, prosecutor's order or decision / other Public Authority provision as well as written authorization from the subject of such data.

The legal basis for your data processing is your consent, as well as the necessity of their storage for the company's response to your requests of any form provided by the relevant legislation.

Specifically, we process your data in order to provide:

- The provision of accommodation, food, transportation and leisure travel
- Information about the products and services provided by our company, (promotion packages, membership in the Loyalty club and other information material of our company).
- For our response to your requests of any kind, such as for providing information, formulating complaints, evaluating services, etc.
- For accounting and tax purposes based on our legal obligation.
- For protecting public health purposes.

Since you have consented to use your data for your information on the products and services provided by our company, as well as for promotional activities of our company (newsletter, social media, etc.), we will maintain this data until notify us of something else or withdraw your consent by sending a request to the email address: [info@whitepearlvillas.com](mailto:info@whitepearlvillas.com).

### Recipients

The processing of your personal data is done by designated and authorized employees of White Pearl Villas. Recipients of your personal data may also be third parties, external partners such as reservation management service, customer transport services, leisure trips organizers, IT support service, accounting support to the extent that this is necessary for your best service and the provision of our services. In this case, White Pearl Villas are committed that its partners, acting only under its instructions, have been specifically authorized for that purpose and are fully bound by the confidentiality and obligations described by the law, regarding the collection and processing of the above data.

### Time of retention

White Pearl Villa retains your data for as long as it is required to fulfill the purpose for which you have shared them with us and in compliance with the applicable laws of personal data protection.

### Your rights

With reference to your personal data, you may exercise the following rights by submitting a request or through a legally authorized representative in our company or by sending the request by post, with the authentication of the signature. In particular, your rights are the following:

- The Right to access - Right to receive information on whether your data is processed and accessed, as well as the right to receive information about this processing (who, for what purpose, recipients, retention period, etc.).
- The Right to rectification - Right to correct inaccurate personal data and fill in incomplete information.
- The Right to erasure (Right to be forgotten) - Right to request the deletion of any of your data under certain conditions (data that are no longer necessary, withdrawal of consent, etc.). You have the right to withdraw your consent, but the withdrawal is valid for the future data, meaning since your notification to White Pearl Villas, and it cannot have a retroactive effect.

- The Right to Restrict Processing - e.g. when the accuracy of the data is in dispute, the data are no longer needed by the controller etc.
- The Right to data portability - The Right to request the transfer of personal data to another Processing Manager in a structured, widely used and mechanically readable form. In case of exercising the right of correction, deleting and restricting the data, the applications will be transmitted to third party recipients to whom the data were disclosed.
- The Right to object in regard to the use of your personal data- unless there are compelling and legitimate reasons for processing that override your interests, rights and freedoms, or for the foundation, exercise or support of our company's legal claims.

The above services are provided free of charge. However, if claims are unreasonable, excessive or recurring, our company may refuse to respond to these requests by informing the applicant. Our company has taken all the technical measures to safeguard your personal data. Also, provides limited access only to those employees / partners who need to have access to these data. It takes all necessary measures to prevent any unauthorized access, use or modification of the data.

### Collection of personal data from website

The policy of personal data protection includes and refers to the conditions of collecting and managing your personal information by White Pearl Villas during the use of its services and visit of web sites. The White Pearl Villas is the owner and holder of all rights of the page and Controller of data that may be declared by you. This current policy does not cover, in any way, the legal relationship between visitors / users of the web pages and any other services that are not subject to control over the management and ownership of White Pearl Villas even when it includes links to other sites controlled by third parties (individuals or entities). Most of our services do not require registration to visit and browse our site without having to disclose your identity. However, in some cases, it may be necessary to sign up to access some services. In case you hide your identity, you may not be allowed to access certain parts and services of our website. The pages may use cookies for the proper functioning of services and pages. Cookies are small pieces of information stored on a computer to identify the corresponding browser while browsing websites. Cookies can be used to store items, such as logins and user preferences. The cookies used by this website only serve the purposes of navigation, the website functionality, to facilitate navigation and therefore does not collect personal data. In addition, pages can also use the "Google Tag Manager" a management tool through which they manage tags. In particular, the "Google Analytics - Universal Analytics" tag is used to extract statistical reports to track the website, daily traffic, and promote the company with regard to the products and services it provides. This webpage only serves purposes of browsing and monitoring through Google Tag Manager and does not collect personal data other than the user's browsing preferences and domains that they have visited. In any case the visitor/user may be informed by the website [www.allaboutcookies.org](http://www.allaboutcookies.org). In addition, it may configure its browser in such a way to inform the user about the use of cookies on specific page services or the choice to refuse/accept the use of cookies at any time. If the visitor/user does not wish the use of cookies, cannot have further access to these services.

### Personal data and children

The current website is not directed to children under 13 years old. It is our policy not to collect or keep data of people under 13 years of age. In any case, most of the information provided by White Pearl Villas websites is addressed to people aged 18 years or over. White Pearl Villas will not collect, use, or disclose on purpose personal data from minors under the age of 18 without having obtained first the consent of the parent or guardian through direct communication, offline, over a network. The White Pearl Villas do not deliberately collect personal information from minors under 18 years old. If it finds out that it has collected any personal data from a minor under 18 without a verifiable parental consent, it will delete the data from its database as soon as possible.

### The purpose of the protection of personal data policy

The purpose of the Privacy Policy is to protect your personal data against all internal, external, deliberate or unintentional threats.

Our company has approved the Privacy Policy and hereby endorses the full commitment to the effective implementation and provision of sufficient resources for the continuous improvement of the Data Protection Management System. The policy aims to ensure the following:

- Continuous data protection from unauthorized access.
- Continuous ensuring of the Confidentiality of White Pearl Villas customers and associates data.
- Continuous maintenance of the integrity of White Pearl Villas, customers and associates data.
- Continuous Ensuring of the Availability of Data and Business Processes.
- Continuous monitoring and compliance with Legislative and Regulatory Requirements.
- The Business Continuity Plan is maintained and controlled for its effectiveness.
- Continuous Data Protection training for all employees of White Pearl Villas.
- Confirmed or suspected violations of personal data are reported to the Data Protection Officer, are thoroughly investigated and addressed promptly and effectively.
- Appropriate procedures and individual data protection policies have been developed and implemented in support of this policy, including technical and organizational protection measures.
- White Pearl Villas ensure constant compliance with the legislation and requirements of GDPR through extended monitoring of the implementation of the Data Protection Management System.
- The Data Protection Officer is responsible for maintaining the Policy, as well as for providing support and advice in its implementation.
- All holders of managerial positions of White Pearl Villas are directly responsible for implementing the Policy as well as for ensuring the compliance of the supervising personnel.
- The compliance with the Policy is mandatory for all those who work or cooperate with White Pearl Villas.
- Any violations of the Policy are subject to disciplinary sanctions depending on the nature and impact of the infringement.

White Pearl Villas preserves the right to change this policy by updating the current text in order to comply with the applicable legislation on data protection as well as for any other reason deemed necessary.

### Contact Information

For any request related to the processing of your data by White Pearl Villas, please contact as soon as possible at the following address: [info@whitepearlvillas.com](mailto:info@whitepearlvillas.com)

If you believe that your privacy is affected in any way, you can appeal to the Data Protection Authority. [Leoforos Kifisias 1-3, 115 23, Athens, Phone: +30 2106475600, email : [contact@dpa.gr](mailto:contact@dpa.gr)]. You also have the right to appeal to the competent judicial authorities for the protection of your personal data.