#### **Personal Data Protection Commitment**

## 1. Our data protection commitment

Larissa Development of Shopping Centres SA, with its registered address at 5 Hatziyianni Mexi Str., Athens, under the registration number 007359201000 (henceforth, 'the Company') is the Controller of the personal data of the present website's Users (henceforth 'the Users' or 'the Data Subjects'), including the respective reserved area (henceforth 'the website').

In that quality, the Company shall always undertake a responsible, loyal and transparent processing of the User's personal data.

As part of its commitment to personal data protection, the Company shall always inform you, before processing your personal data, of the necessary information so that you understand the manner and the conditions under which your personal data will be processed.

The present document aims precisely to inform the Users of the necessary information regarding the processing of their personal data.

The type of personal data that we collect and process, through your use of our website, stems from the information that you supply to us through the registration on the site and its browsing.

Your personal data is safe with us for we will always be committed with the adoption of technical and organizational measures that are appropriate to the protection of your personal data.

# 2. How do we collect and process your personal data and to what ends?

The website is only meant for, and should only be used by, those over 16 years of age. We do not process willingly and knowingly the personal data of children. If we discover that we have collected the personal data of children we will immediately proceed to its erasure. We ask that you contact us if you know that we collected or processed the personal data of children.

When you create an account on our website, we will collect your first name, last name and email address, for the purposes of identification and access to our reserved area, where you will obtain exclusive discounts and promotions. Additionally, you may provide us, if you so choose, information regarding your telephone contact, gender and marital status.

When you create an account on our website, you are given the possibility of not accepting the processing of the aforementioned personal data for sending promotions, sweepstakes and information on other activities promoted by the Company or by its respective partners, including our newsletter. If you do not withdraw acceptance to the sending of these communications at the moment of the account's creation, you may do so whenever you receive one of our communications, by selecting the option "If you do not wish to receive more emails from [center's name] click here", or similar, or by exercising your right to object under the terms indicated below.

You may also subscribe to the Company's newsletter without previously creating an account on our website; in that case we will only collect your email address in order to send it.

We may use personal data that you supply us related to your preferences regarding promotions and other contents, in order to establish a profile and develop and complete that profile with information on how you use the website, react to the contents or interact with the Company. We will only use that profile to promote the sending of information in which you may be interested. The Data Subject will not, in any case, be subject to automated individual decision-making which produces legal effects concerning him (namely refusing him access to products, services or benefits) or which similarly affect him.

We process the personal data you supply us through our website based on the company's legitimate interest in promoting our products and services or those sold in the shopping center "Fashion City Outlet".

We process your data and store it for a maximum period of 2 (two) years counting from your last interaction (storage period) or, when applicable, until the exercise of the right to object or the right to be forgotten (right to erasure) by the Data Subject. After the storage period ends, the Company will eliminate or anonymize the data whenever it cannot be stored for a different purpose that may subsist, as may be the case of complying with a legal obligation that the Company is subject or the exercise or defense of a right.

### 3. To whom may we communicate your personal data?

Whenever it is necessary, we may communicate your personal data to entities that provide services to the Company.

In those cases, we contractually impose that those recipients implement adequate security measures to protect your personal data.

In the categories of recipients to whom we may communicate personal data include:

- i. AMJRF Consulting, Lda.
- ii. LOG.OSCON, Lda.

- iii. WIDGILABS, Lda.
- iv. Key Decision Unipessoal, Lda.
- ν. Ιωάννινα Ανάπτυξη Εμπορικών Κέντρων Α.Ε.

And possibly other providers of the following services:

- vi. data storage (data center);
- vii. conception and execution of marketing materials and supports.
- viii. supply of the website's technological structure, technical support and systems' maintenance and applications.

We may possibly transfer your personal data in the context of a business sale or of the shopping center "Fashion City Outlet", of a merger, demerger or control change within the Company or in the context of preparing any of those events. In any case, the processing of the data by the entity in for whom they have been transferred will respect the terms of the present data protection commitment.

### 4. How May You Exercise your Data Protection Rights?

The data subject may exercise his or her right by contacting the company at the address: <a href="mailto:dataprotection@fashioncity-outlet.gr">dataprotection@fashioncity-outlet.gr</a>

The data subject may exercise, under the terms of the law, the following rights:

- right of access;
- right to rectification;
- right to restriction of processing;
- right to data portability;
- right to object;
- right to be forgotten (or right to erasure)

He or she is also entitled, under the terms of the law, to the right to lodge a complaint to the Greek Data Protection Authority.

# 5. Updates to this Data Protection Commitment

The terms of the present commitment may be altered or updated, which will be subject to disclosure on our website.

### 6. <u>Document changes</u>

Date	Version	Country	Comments
23.05.2018	1.0	GR	Initial version for Online Publishing (online)