

# BUS SERVICE PRIVACY POLICY

The present document provides information based on REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on Personal Data Protection. The Controller of the Personal Data requested from you is the Company "SARRIS D. & A. TOURIST ENTERPRISES Société Anonyme" (ΣΑΡΡΗΣ Δ. & Α. ΤΟΥΡΙΣΤΙΚΕΣ ΕΠΙΧΕΙΡΗΣΕΙΣ ΑΝΩΝΥΜΗ ΕΤΑΙΡΙΑ), traded under the name "SARRIS D. & A. S.A." (hereinafter referred to as the "Company"), located in Kifissia, Attica, Greece, 70 Acharnon St., Tax Identification no. 99718271, Registration Number at the "HELLENIC BUSINESS REGISTRY" #136316001000).

The following terms describe how the Company uses the information you provide, either for yourself or for the child – student whose the parental responsibility you hold (hereinafter called "The Student").

1. Our Company, after taking into account the nature of the Personal Data that you provide, follows specific and strict procedures in order to ensure its security and its lawful and fair processing by taking and updating the necessary measures of technical security and organization of its processing. The Company makes sure that its personnel and its associates have a high standard of integrity and take the appropriate technical and organizational measures for the protection of your Personal Data in compliance with Greek and European legislation.
2. The purpose of personal data processing and time limit on storing it.
  - 2.1. Introductory remarks: For the purposes of the present, the term "Personal Data processing" is used to indicate any operation which is performed on personal Data, such as: collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
  - 2.2. Purpose and legal basis for the processing of your Data:
    - 2.2.1. The Personal Data that you provide to the Company and are related to you or to the minor(s) in your custody, are relevant and absolutely necessary and are being used strictly for the fulfillment of our contractual obligations arising from the "Private Agreement for Student transportation Between Parents and Bus Contractor", and to provide you with our Services according to art. 6 par. 2 subparagraph (b) Reg. 2016/679.
    - 2.2.2. In other words, the following Data are necessary for the Purposes of the above-mentioned Contract. If you do not provide us with all or some of the information requested, we will not be able to provide the Student with the Transportation services and we reserve the right not to perform the Contract.
    - 2.2.3. In particular, we will need the following information:
      - First and Last Name of the Student
      - Student's age and grade at ACS Athens
      - First and Last name of Student's parents or of his custodians and/or of the person responsible to accompany the Student to/from the bus
      - Home Address
      - School Address
      - Home telephone number and cell phone numbers of the Parents or of his custodians and of the person responsible to accompany the Student to/from the bus.
      - E-mail addresses of the student's parents or custodians
    - 2.2.4. In order to provide you with the best and safest possible services, to ensure the compliance of the

Company with its legal obligations, to protect the vital interests of the Students (art. 6 par. 2 sub. (d) Reg 2016/679) and to safeguard the legitimate interests pursued by the Company, all our buses are equipped with a Global Positioning System (GPS) tracking unit, which notifies our Transportation Office if the bus' speed surpasses the upper limit of 90 km/hour, allows us to control the fuel's level and to detect possible leakages and/or malfunctions. It also provides us with a "Panic Button" service, which is activated by the bus driver, in case of an emergency, notifying our Transportation Office in order to enable us to act immediately. The Data being received by the GPS unit are saved to our records for one year and they are automatically deleted.

2.2.5. In order that we perform the Contract the best way possible, determine our billing policy and safeguard the legitimate interests pursued by the Company (art. 6 par. 2 sub. (f) Reg 2016/679 – e.g. in order to manage disputes and claims), we also keep:

- Lists with the student's name, stops, grade and cell phone numbers of the parents or guardians for each bus.
- A weekly attendance list for each bus, in which the daily presence or absence of each Student is being recorded.

2.2.6. For reasons of the Company's compliance with its legal obligations (art. 6 par. 2 sub. (f) Reg 2016/679 - e.g. obligations imposed by the fiscal Authorities), you are required to provide the following additional information:

- Tax Identification no & Office of Tax Authority of the Student's parent or of the person whose name appears on the receipt of payment. If you do not provide us with the above information, we may face administrative or other penalties and, therefore, we reserve the right not to perform the Contract.

2.3. Storage period of your Data: Your data is kept throughout the duration of the Contract and for five (5) years from the end of our relationship. However, we keep certain data even after the above period of 5 years when such preservation is allowed or imposed by law or when needed to manage disputes and claims.

2.4. We do not share nor transfer by any way to third parties the data that you have communicated to us with the exception of cases where such notifications are required by law. We may also share your data with third parties when necessary for the establishment, exercise or defense of the Company's legal claims.

2.5. We do not communicate nor transfer your Data to third countries (Outside the EEA).

### 3. Your rights:

3.1. Right of access: You have the right to obtain confirmation as to whether or not your personal data are being processed, and access to the personal data.

3.2. Right to rectification: You can request the correction of your personal data which may be incorrect and limit how it is processed while the changes are being processed.

3.3. Right to erasure: You can also request that your personal data be erased in the following cases:

3.3.1. You feel that the processing of your data is no longer needed for the above purposes or any other relevant purpose.

3.3.2. You object to the processing of your personal data, when this processing serves the Company's legitimate interests

3.3.3. The Enterprise may retain certain personal data about you when required by law or when we have a legitimate reason to do so (for example, <sup>2</sup> to prove the execution of the Contract), for the exercise or defense of rights in court.

3.4. Alternatively, within the limits of the law, you can request that the processing of your personal data be

limited (right to restriction of processing).

3.5. Right to lodge a complaint with the supervisory authority: If you find that your rights are not respected or that your data is not protected, you have the right to lodge any complaint concerning the processing of your data with the Hellenic Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)).

4. Contact information: For any questions about this data protection policy or in order to exercise your rights concerning your personal data, you can contact us either by telephone (+30 210 80 12 379) in written at: [info@sarristours.gr](mailto:info@sarristours.gr).

I have read the above information and I consent to the processing of my Personal Data.

I have read the above information and I consent to the processing of the Personal Data of the minor(s) in my custody.

Athens, Date: \_\_\_\_\_

Student Name(s): \_\_\_\_\_

Parent/Guardian NAME (Print): \_\_\_\_\_

Signature: \_\_\_\_\_