

# Bus Service Privacy Notice

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 parental responsibility you hold (hereinafter called “The Student”).

1. Our Company, after taking into account the nature of the Personal Data you provide, follows specific and strict procedures to ensure its security and lawful and fair processing, by implementing and updating the necessary technical and organizational measures. The Company ensures that its personnel and associates maintain a high standard of integrity and take appropriate technical and organizational measures to protect your Personal Data in compliance with Greek and European legislation.
2. The purpose of personal data processing and the 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 Article 6(1)(b) GDPR — processing necessary for the performance of a contract or in order to take steps prior to entering into a contract..
    - 2.2.2. In other words, the following Data are necessary for the Purposes of the above-mentioned Contract. Where the requested information is necessary for transportation, safety, billing, or legal compliance, failure to provide it may prevent the Company from providing the service or issuing the required documentation.
    - 2.2.3. In particular, we will need the following information:
      - First and Last Name of the Student
      - Student age and/or grade are collected only where necessary for route planning, supervision, age-appropriate safety arrangements, or identification.
      - First and Last name of Student’s parents or of his custodians and/or of the person responsible for accompanying the Student to/from the bus
      - Note: Because student route, address, and contact information concerns minors and their daily movements, access to such information is restricted to authorized personnel only:
      - Home Address
      - Home telephone number
      - Mobile phone numbers of the Parents or of his custodians and of the person responsible for accompanying the Student to/from the bus. Parents/guardians are responsible for informing any authorized accompanying or pickup person that their name and contact details may be provided

to the Company for transportation and safety purposes.

- E-mail addresses of the student's parents or custodians

2.2.4. For emergency response, the Company may process data where necessary to protect the vital interests of students under Article 6(1)(d) GDPR. Routine GPS use for safety, route management, vehicle monitoring, and service verification is based on the Company's legitimate interests under Article 6(1)(f) GDPR. GPS data relates to the vehicle and route. It may indirectly relate to students when combined with route and attendance records. Access is limited to authorized transportation/operations personnel and, where applicable, technical providers bound by confidentiality and data protection obligations. GPS data is not used for marketing or unrelated monitoring. GPS records are retained for up to one year for safety review, incident investigation, route verification, dispute management, and legal claims, unless a longer period is required for a specific incident or legal obligation.

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 (Article 6(1)(f) GDPR – 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. Bus lists are provided only to authorized transportation staff, such as route coordinators, drivers, and monitors, on a need-to-know basis. Lists must not be copied, photographed, shared through unauthorized messaging applications, or retained after they are replaced or no longer needed.
- A weekly attendance list for each bus, in which the daily presence or absence of each Student is being recorded. Routine attendance lists are retained only for the period necessary for transportation verification, billing, safety review, or dispute management, and are then securely deleted, unless required for a specific incident or legal claim.

2.2.6. For compliance with legal obligations, including tax and accounting obligations, the Company processes Tax Identification Number and competent Tax Authority under Article 6(1)(c) GDPR - e.g. obligations imposed by the fiscal Authorities), you are required to provide the following additional information:

- Tax Identification Number and Tax Authority of the parent/guardian or other adult person in whose name the receipt/invoice is issued. 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:

- Parent contract and billing data -- As required by tax/accounting law and legal claims limitation periods
- Student route lists -- Current school year/contract period, then deleted or archived only if needed
- Weekly attendance lists -- Short operational period unless needed for billing, incident review, or dispute
- GPS data -- Up to one year, unless linked to a specific incident or claim
- Incident/safety reports -- As long as necessary for safeguarding, claims, or legal obligations
- Tax information -- As required by applicable tax/accounting law.

2.4. We do not sell personal data. We may disclose personal data only where necessary to authorized personnel, ACS Athens, where relevant for transportation coordination, professional advisors, insurers, competent authorities, IT/GPS service providers, or other service providers acting under appropriate confidentiality and data protection obligations.

2.5. The Company does not intentionally transfer personal data outside the EEA. If any such transfer becomes necessary, it will take place only in accordance with GDPR transfer requirements..

2.6. The Company does not use personal data collected for transportation services for automated decision-

making or profiling.

2.7. *Breach Notification*: Any actual or suspected unauthorized access, loss, disclosure, or misuse of student transportation data shall be handled under the Company's personal data breach response procedure and, where required, notified to the competent authority and/or affected individuals in accordance with GDPR.

3. Your rights:

3.1. Right of access: You have the right to obtain confirmation of whether your personal data are being processed and to access them.

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. Where the personal data are no longer necessary for the purposes for which they were collected or otherwise processed, subject to applicable legal exceptions..

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, to prove the execution of the Contract), for the exercise or defense of rights in court.

3.3.4. Alternatively, within the limits of the law, you can request that the processing of your personal data be limited (right to restriction of processing).

3.4. 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)).

- *Acknowledgment*: The Company recognizes that student personal data concerns minors and applies enhanced confidentiality and access controls accordingly.

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 \_\_\_\_\_ in writing at: \_\_\_\_\_.

I acknowledge that I have received and read the Bus Service Privacy Notice..

I acknowledge that I have received information regarding the processing of my child's personal data for student transportation services.

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

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

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

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