	IMS	CODE: F.01.03
	Data Protection Policy	VERSION: 01
AUTHOR: QUALITY AWARD	VERSION DATE: 10/03/2025	APPROVED BY: SMART NS

The Data Protection Policy (GDPR) of Smart NS recognizes the importance of protecting personal data and is committed to complying with all regulations and requirements of the **General Data Protection Regulation (GDPR)** of the EU, ensuring that the personal data of its customers, employees, suppliers and partners, as well as the general public, are protected in the best possible way.

This policy defines the way in which the company collects, stores, processes and protects personal data, in order to ensure compliance with the GDPR.

Our main objectives, to which the company's top management is committed, are:

- To ensure the protection of the personal data we manage, in full compliance with the requirements of the GDPR, ensuring the confidentiality, integrity and availability of this data.
- To always comply with the applicable legislation on the protection of personal data and to constantly inform and train our staff about their obligations.
- To constantly improve the effectiveness of data protection procedures and policies, in order to ensure the high quality and security of our services.

To achieve the above objectives:

- The company's top management has the necessary resources (personnel, equipment, technology) for the implementation of the policy and data protection.
- All executives and employees of the company are responsible for the implementation of the policy within their responsibilities, actively contributing to the protection of personal data.

### Personal Data Security

Smart NS implements appropriate technical and organizational measures to protect personal data from any breaches, theft, destruction or unauthorized access. The measures include:

- Restricted access to data only to authorized persons
- Training of staff on data protection
- Implementation of security policies and regulations to prevent breaches


### Data Retention

Smart NS retains personal data only for as long as is necessary to fulfill the purpose of the processing and in accordance with the law. After this period, the data is deleted, unless their retention is required for legal or other reasons.

### Contact and Questions

For any questions or concerns regarding the protection of personal data or this Policy, please contact the company's Data Protection Officer (DPO):

Name of Data Protection Officer (DPO): Panagiotis Chiras

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Contact email: p.chiras@smartns.gr

Telephone: +306975904996

Smart NS reserves the right to update and modify this policy to remain in line with all relevant legal requirements and its Private Information Management System (ISO 27701:2019) procedures.

The Private Information Management System (PIMS) covers the following areas:

### **COMPUTER SYSTEMS MANAGEMENT SERVICES**

The company's top management is actively committed to the implementation of the Private Information Management System and has assigned the Private Information Manager the responsibility and the required authorization for:

- Communicating to all employees the importance of achieving the system's objectives and ensuring their understanding.
- Establishing and implementing the PIMS.
- Monitoring the implementation of the PIMS and tracking the achievement of the system's objectives.

The data protection policy is known and understood by all employees of the company as well as by any interested party, with the aim of strict compliance with it and its necessary implementation by all employees.



**Panagiotis Chiras,**  
**CEO**