

WEBSITE PRIVACY AND PERSONAL DATA PROTECTION POLICY

DOCUMENT DETAILS

Title	Website Privacy Policy
Document code	SALFO_WEB-PRIVACY-POLICY_EN
Version	2.0
Approval date / effective date	25.09.2026
Approved by	Board of Directors
Document owner	Data Protection Officer (DPO)
Classification	Public – published on the corporate website
Legal framework	Regulation (EU) 2016/679 (GDPR), Greek Law 4624/2019 and Greek Law 3471/2006
Related documents	Cookies Policy, Website Terms of Use, Job Applicant Privacy Notice
Next review	Annually, and ad hoc in the event of a material legal, organisational or technical change

REVISION HISTORY

Version	Date	Description of changes	Approval
1.0	-	-	-
2.0	25.09.2026	Stand-alone policy for processing carried out through the website, with specific provisions on contact requests, CV submission and technical data, and a cross-reference to a separate Cookies Policy.	Yes

This Policy explains clearly which personal data ΣΑΛΦΩ ΚΑΙ ΣΥΝΕΡΓΑΤΕΣ Α.Ε. (SALFO & Associates S.A.) processes when you visit salfo.gr, contact the Company or submit a job application through the website or the linked recruitment platform.

1 Purpose and scope

This Website Privacy Policy (the “**Policy**”) applies exclusively to the processing of personal data in connection with visits to and use of the website <https://salfo.gr/> (the “**Website**”), the sending of enquiries or messages to the Company, and the submission of applications through the “Career” section or the linked recruitment platform.

It does not cover the internal processing of data of employees, executives, associates, clients, suppliers or other business contacts, to which separate policies or notices apply. The use of cookies and similar technologies is governed exclusively by the separate Cookies Policy.

2 Controller and contact details

The controller is «ΣΑΛΦΩ ΚΑΙ ΣΥΝΕΡΓΑΤΕΣ ΑΝΩΝΥΜΗ ΕΤΑΙΡΕΙΑ – ΣΥΜΒΟΥΛΟΙ ΔΙΑΧΕΙΡΙΣΗΣ ΚΑΙ ΤΕΧΝΙΚΩΝ ΕΡΓΩΝ» (SALFO & Associates S.A. – Management and Technical Projects Consultants), with the distinctive title «ΣΑΛΦΩ ΚΑΙ ΣΥΝΕΡΓΑΤΕΣ Α.Ε.», General Commercial Registry (G.E.M.I.) No. 117037201000, Tax Identification No. 095702185, with its registered office at 102 Vasilissis Sofias Avenue, 115 28 Athens, Greece (the “**Company**”, “SALFO”, “**we**”).

Telephone: +30 210 9210080 | E-mail: info@salfo.gr

For data protection matters, you may contact our Data Protection Officer (DPO) at dpo@salfo.gr or by post at the above address, marked “For the attention of the DPO”.

3 Data, purposes and legal bases

We process only the data that are necessary for the relevant purpose. The main processing operations carried out through the Website are the following:

Context and data	Purpose of processing	Legal basis
Contact via form or e-mail: full name, e-mail address, company or capacity, country/office or selected subject, message content and any information you attach or disclose.	Receiving, routing and responding to your request; communicating with you; taking pre-contractual steps, where the request concerns a potential collaboration or the provision of services.	Article 6(1)(b) GDPR, where you request pre-contractual steps; Article 6(1)(f) GDPR for the legitimate handling of other business communications.
Job applications: identification and contact details, CV, education, professional experience, licences and certifications, portfolio, cover letter, answers to screening questions, references and any other information you provide.	Receiving and assessing applications; communication and interviews; selection of staff or associates; staffing of positions and projects; retention in a talent pool for future opportunities, where you have opted in.	Article 6(1)(b) GDPR for pre-contractual steps; Article 6(1)(f) GDPR for the organisation of the selection process; consent, where required for retention for future opportunities.
Technical data: IP address, date and time of access, page or resource requested, device and browser type, operating system, identifiers, and security or error logs.	Technical operation, availability and security of the Website; prevention of misuse and cyberattacks; diagnosis of technical issues and documentation of incidents.	Article 6(1)(f) GDPR: legitimate interest in the secure and reliable operation of the Website and systems.
Data protection requests: contact details, content of the request, identification details where necessary, and related correspondence.	Handling and documenting requests to exercise data subject rights or other data protection matters.	Article 6(1)(c) GDPR for compliance with the Company’s legal obligations, and Article 6(1)(f) GDPR for the establishment or defence of legal claims.

4 CVs and special categories of data

The “Career” section links to an external recruitment platform through which you may submit your CV for a specific position or for future opportunities. The Company processes application data as controller. To the extent that the platform provider hosts and manages applications on behalf of the Company, it acts as processor under a relevant agreement. Any processing carried out by the provider for its own purposes is governed by the provider’s own privacy notice.

Please do not include in your CV or message any health, biometric or genetic data, or information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or sex life or sexual orientation, unless this is strictly necessary and there is a lawful basis for processing. If you voluntarily disclose such data to us, we will process them only to the extent permitted by Article 9 GDPR, or we will delete them where they are not necessary.

Detailed information about the selection process and applicants’ data is provided in the Job Applicant Privacy Notice, which supplements this Policy.

5 Sources and mandatory provision of data

As a rule, data are collected directly from you when you complete a form, send a message or submit an application. In the context of an application, we may also receive information from persons you have named as referees, from professional platforms or from publicly available professional sources, where this is relevant and lawful.

Fields marked as mandatory are necessary for the submission and processing of your request or application. If you do not provide them, it may not be possible to submit the form, respond to your request or assess your application.

6 Recipients of data

Access to the data, only to the extent necessary for the relevant purpose, may be granted to: authorised employees and executives of the Company, in particular of the departments responsible for your request, Human Resources, Management, IT and Legal, who are bound by confidentiality obligations; providers of hosting, technical support, cybersecurity, e-mail, website management and recruitment platform services, acting as processors under written agreements; companies, branches or offices of the SALFO Group, where the request or position concerns their activities and disclosure is necessary; professional advisers, insurers or legal representatives, where necessary for obtaining advice or for the establishment, exercise or defence of legal claims; and public, administrative, supervisory, judicial or prosecuting authorities, where disclosure is required by law or by a lawful order.

The Company does not sell or otherwise make available for consideration the personal data of Website visitors.

7 Transfers outside the European Economic Area

Certain service providers, or companies and offices of the SALFO Group, may be located outside the European Economic Area (EEA), in particular where a request or application concerns a position or activity outside the EEA. In such cases, the transfer takes place only if the conditions of Articles 44 et seq. GDPR are met, in particular on the basis of an adequacy decision of the European Commission, standard contractual clauses or another lawful transfer mechanism, and supplementary measures are applied where required.

You may request further information about the transfer mechanism applied, or a copy of the relevant safeguards, by contacting the DPO.

8 Retention period

We retain data only for as long as required for the purpose for which they were collected, taking into account our legal obligations and the need to establish or defend legal claims.

Category	Standard retention period
Messages and contact requests	For as long as required to complete the communication and up to two (2) years after the request is closed, unless it develops into a contractual relationship or longer retention is required in connection with a legal claim.
Applications and CVs	For the duration of the selection process and, where they also concern future opportunities, up to two (2) years from submission, unless earlier deletion is requested or longer retention is required in connection with a legal claim.
Technical logs	As a rule, up to twelve (12) months, unless longer retention is required to investigate a security incident, misuse or a legal claim.
Data subject rights requests	For as long as required to handle the request and thereafter for as long as necessary to demonstrate compliance and defend any claims.

Upon expiry of the applicable period, data are securely deleted or anonymised, unless their further retention is required by law.

9 Cookies and similar technologies

The use of cookies, analytics tools, security technologies and other similar technologies is described in the Website's separate Cookies Policy. Through the cookie settings tool, you can give, refuse or withdraw your consent to non-essential categories of cookies.

10 Data security

The Company implements appropriate technical and organisational measures, proportionate to the risk, to protect data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. These measures include, as appropriate, access restriction and control, permissions management, secure transmission and storage, logging, backups, incident management procedures and confidentiality obligations. No method of transmission or storage is completely secure. Please do not send through the Website any information that is not necessary for your request or application.

11 Automated decision-making

The Company does not, through the Website or the application process, take decisions based solely on automated processing which produce legal effects concerning you or similarly significantly affect you. Any technical support tools do not replace human assessment.

12 Your rights

Subject to the conditions of the GDPR, you have the right to:

- be informed about and access the data concerning you;
- rectification of inaccurate data and completion of incomplete data;
- erasure, where there is no lawful ground for further processing;
- restriction of processing;
- data portability, where processing is based on consent or a contract and is carried out by automated means;
- object to processing based on legitimate interest, on grounds relating to your particular situation; and
- withdraw your consent at any time, where processing is based on consent, without affecting the lawfulness of processing prior to its withdrawal.

To exercise a right, you may send a request to dpo@salfo.gr or by post to the Company's address, for the attention of the DPO. We may request additional information only where we have reasonable doubts as to your identity.

We will respond without undue delay and, in principle, within one (1) month. This period may be extended by up to two (2) further months, taking into account the complexity and number of requests, in which case you will be informed in good time. Exercising your rights is free of charge, unless a request is manifestly unfounded or excessive.

13 Right to lodge a complaint

If you consider that the processing of your data infringes applicable law, you have the right to lodge a complaint with the Hellenic Data Protection Authority via its website www.dpa.gr. We encourage you to contact the DPO first, so that we can look into your concern promptly; this does not limit your right to apply to the Authority.

14 Third-party links and services

The Website contains links to third-party websites, social media and services, including the recruitment platform. When you visit a third-party service, that party's own terms and privacy policies may apply. The Company does not control processing carried out by third parties for their own purposes.

15 Updates to this Policy

This Policy may be updated to reflect changes to the Website, the processing operations, technology or the applicable legal framework. The current version is published on the Website and is identified by the version number and effective date in the "Document details" table. In the event of material changes, appropriate notice will be provided through the Website or by other suitable means.

