

# **Privacy Notice for Suppliers, Service Providers and Visitors**

## **General Information**

1. This Privacy Notice is addressed to:
  - a. our suppliers and service providers who are individuals (such as self-employed persons);
  - b. the representatives, employees, or contact persons of our suppliers and service providers who are legal entities; and
  - c. visitors to our facilities.
2. As used in this privacy statement, “PwC”, “us”, and “we” refer to the PwC network and/or one or more of its Member Firms that may process your personal information. Each Member Firm in the PwC network is a separate legal entity. The data controllers of your personal information are one or more of the Member Firms listed here at <https://www.pwc.com/gx/en/about/corporate-governance/legal-entities.html>. For further details, please see [www.pwc.com/structure](http://www.pwc.com/structure). See <http://www.pwc.com/gx/en/about/office-locations.html> for a list of countries and regions in which PwC Member Firms operate.
3. This Privacy Notice describes the context in which we process your personal data and it explains your rights and obligations.

## **What information do we have about you?**

4. We obtain your personal information either directly from you or through the supplier or service provider for whom you work.
5. We may collect various types of personal data about you, including:
  - a. your personal information (e.g., first name, last name, email address, address, phone number, identification document, video recording);
  - b. information about your employer (e.g., name of your company and your title, position); and
  - c. any other information necessary for the purposes of managing our relationship.
6. Additionally, for our suppliers and service providers who are individuals (such as self-employed persons), we may collect the following types of personal data, including:
  - a. certain financial information (e.g., bank account details).
7. Additionally, for any person from our suppliers and service providers who have access to our computer systems, we may collect the following types of personal data, including:
  - a. information regarding your function at PwC Greece (e.g., position, business unit, location, time zone, cost center, supervisor/manager);

- b. work related information (e.g., work order number, identification number, start date and end date, status of any required training, billing rate and amount);
  - c. your electronic identification data where required for the purpose of delivering products or services to our company (e.g., login, passwords, badge number and photograph, IP address, online identifiers/cookies, logs, access and connection times, and CCTV footage or other video surveillance (only if legally permitted and where clearly indicated)); and
  - d. certain compliance related information (e.g., records of required training).
8. If you intend to provide us with personal data about other individuals (e.g., your colleagues), you must provide a copy of this Privacy Notice to them directly or through your employer.

### **For which purposes do we use your personal data and why is this justified?**

9. Legal basis for the processing:
10. We will not process your personal data without a proper legal basis. Therefore, we will only process your personal data if:
- a. the processing is necessary to take pre-contractual steps with you or to perform our contractual obligations towards you (or the supplier or service provider for whom you work);
  - b. it is necessary to comply with our legal or regulatory obligations (e.g., conducting supplier due diligence or exercising our audit rights);
  - c. it is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms. Please note that, when processing your personal data on this basis, we always seek to maintain a balance between our legitimate interests and your privacy. Examples of 'legitimate interests' are data processing activities performed:
    - i. to benefit from cost-effective services (e.g., we may opt to use certain platforms offered by suppliers or service providers to process data),
    - ii. to offer our products and services to our customers,
    - iii. to prevent fraud or criminal activity, misuse of our products or services, and to protect the security of our IT systems, architecture, and networks,
    - iv. enable the acquisition of all or part of our business or assets by a third party,
    - v. to meet our corporate and social responsibility objectives;
  - d. we have obtained your prior consent; and/or
  - e. we are otherwise permitted or required by law to do so.

### **Purpose of the processing**

11. We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. In particular, we process your personal data to:

- a. manage our suppliers and service providers;
  - b. organize offers, implement tasks in preparation of, or to perform existing engagement contracts;
  - c. monitor our facilities to ensure compliance with applicable policies and laws;
  - d. grant you access to our facilities and/or certain technologies to allow you to perform services;
  - e. manage our technology resources (e.g., cyber-risk management, infrastructure management and business continuity);
  - f. preserve our economic interests and ensure compliance (e.g., complying with our policies and legal requirements, tax and deductions, managing alleged cases of misconduct or fraud, conducting audits);
  - g. preserve our legal interests (e.g., enforcing or defending our legal rights);
  - h. archiving and record-keeping;
  - i. billing and invoicing; and
  - j. any other purposes imposed by Greek applicable laws and governmental authorities.
12. You are under no obligation to provide PwC Greece with your personal data. However, if you fail to provide personal data when requested which is necessary for us to manage our relationship with you or your employer as a service provider or supplier (e.g., information necessary to evaluate your qualifications or meet our regulatory and legal obligations), we may not be able to retain your services.

**Who has access to your personal data and to whom are they transferred?**

13. We will never share / transfer your personal data to third parties other than those indicated in this Privacy Notice. In the course of our activities and for the purposes listed in this Privacy Notice, we may transfer or disclose the personal data we collect to third party contractors, subcontractors, and/or their subsidiaries and affiliates. Third parties support the PwC Network in providing its services and help provide, run and manage IT systems. Examples of third party contractors we use are providers of identity management, website hosting and management, data analysis, data backup, security and cloud storage services. The servers powering and facilitating our IT infrastructure are located in secure data centers around the world, and personal data may be stored in any one of them. The third party providers may use their own third party subcontractors that have access to personal data (sub-processors). It is our policy to use only third party providers that are bound to maintain appropriate levels of security and confidentiality, to process personal information only as instructed by PwC Greece, and to flow those same obligations down to their sub-processors.
14. Such recipients are obligated to protect the confidentiality and security of your personal data.
15. In certain limited circumstances, your personal data may be accessed by or transferred to law enforcement, regulatory bodies, or judicial authorities. This will occur only when legally required.

16. The personal data we collect from you may be processed, accessed, or stored by PwC Greece in a different country than where you are located including outside of the European Economic Area, which is the EU Member States plus Iceland, Liechtenstein and Norway.
17. When we transfer your personal data for an intra-group transfer to another PwC entity located in a country that does not offer adequate protections, PwC uses the European Commission's standard contractual clauses. Standard contractual clauses are a set of contract terms approved by certain jurisdictions and deemed to provide adequate protections for cross-border transfers.
18. When we transfer your personal data to an external company in a country that does not offer adequate protections, we will make sure to protect your personal data by (i) requiring that the third party apply the level of protection required under the applicable local data protection laws, (ii) requiring that the third party act in accordance with our written instructions and our policies and standards and, (iii) unless otherwise specified, only transferring your personal data on the basis of an appropriate contractual mechanism (such as the standard contractual clauses approved by the European Commission).
19. You may request additional information in relation to such cross-border transfers and obtain a copy of the adequate safeguard put in place by PwC Greece as described in the section titled "Who can I contact if I have any questions or concerns?".

### **How do we protect your personal data?**

20. We implement appropriate technical and organizational measures to provide a level of security and confidentiality to your personal data. These measures take into account the state of the art of technology; the costs of its implementation; the nature of the personal data; and the risk of its processing.
21. The purpose of these measures is to protect your personal data against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access, and against other unlawful forms of processing.
22. While we take reasonable care to implement such measures, the internet is inherently unsafe and we cannot guarantee the security of your personal data when transmitted over the internet, email, or on our websites.
23. Moreover, when handling your personal data, we:
  - a. only collect and process personal data which is adequate, relevant, and tailored to meet the related purpose; and
  - b. ensure that your personal data remains up to date and accurate.
24. We may request that you confirm the personal data we hold about you. You are invited to inform us whenever there is a change in your personal circumstances so we can update your personal data.

### **How long do we store your personal data?**

25. We will only retain your personal data for as long as necessary to fulfill the purpose for which it was collected, or to comply with legal or regulatory requirements, or to protect against legal claims.

### **What are your rights?**

26. Your rights are based primarily on the data protection law of the country in which you are located, and may be limited by regulatory requirements or our lawful basis for processing.
27. You may have one or more of the following rights: (1) to be informed whether we process your personal data and what data is processed; (2) to request correction of processed data, if it is incorrect or incomplete; (3) to oppose the processing and to restrict the processing of your personal data; (4) to ask for the deletion of your personal data; and (5) to request the transfer of your personal data to a third-party.

### **Who can I contact if I have any questions or concerns?**

28. In any case, and in addition to any rights you may have, you may file a complaint with the competent data protection authority in your country. If you have any questions about how your personal data is processed (including if you are unsure of which PwC entity is the controller), or if you want to exercise one of your rights, please **submit a request** or an **enquiry** if you have a question or complaint about the handling of your personal data.

### **How will you be informed of the changes to our Privacy Notice?**

29. You will be informed of any changes or additions to the processing of your personal data through updates to this Privacy Notice available on our website. To assist you, this Privacy Notice has an effective date as shown at the end of the document.

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