

## **B. PERSONAL DATA COLLECTION AND HANDLING POLICY**

### **Priorities of OPAP S.A.**

Respecting privacy and protecting the personal data of the visitors of website [www.kerkidaopap.gr](http://www.kerkidaopap.gr) of OPAP S.A. are of paramount importance during the planning of its business policy.

### **Automatic Collection of Data (Cookies)**

OPAP S.A. collects technical data of visitors through the use of cookies in website [www.kerkidaopap.gr](http://www.kerkidaopap.gr), with the aim to provide a more functional and user-friendly online environment, as well as to manage sessions, provide customized website experience and adapt advertising and other content to the needs and preferences of every visitor. In addition, the data collected through cookies may be used for anonymous statistics purposes, which help us understand how the public uses the website and which assist in the improvement of its structure and content (e.g. by improving less popular web pages and by adding content to more popular ones).

The data which are automatically recognized and collected through cookies by our web server are the IP address, the domain name, the browser types used, as well as information regarding the PC system of each visitor/ user. However, in no case are these data associated, without the prior consent of visitors/users, with their personal data, which are kept in OPAP S.A.'s files.

This practically means that, even though a visitor's/ user's path within the website is recorded, he/she remains anonymous, and therefore he/she may not be identified following association with other information. The extraction of data for statistics relates to the total traffic of the website and not to the recording of every unique visitor.

Every visitor is provided with the option to configure the settings of his/her browser to maintain or reject the cookies of his/her choice. However, some functions are only available through cookies, and rejecting them may render these functions unavailable.

### **Non-Automatic Collection of Data**

#### **Introduction**

OPAP S.A., having its seat in Athens, 112 Athinon Avenue, in its capacity as data controller, processes the personal data provided voluntarily by the

visitors/ users of website [www.kerkidaopap.gr](http://www.kerkidaopap.gr) during the use of its services, in compliance with Regulation 2016/679 of the European Union, as well as with the applicable Greek legislation on the protection of personal data.

OPAP S.A. does not collect information on the visitors/ users of website [www.kerkidaopap.gr](http://www.kerkidaopap.gr) from other sources, such as public records, bodies or private organizations.

### **Processing Purposes and Basis**

OPAP S.A. processes identity particulars [full name, date of birth, social security number (AMKA)] and the contact details (e-mail, phone number) provided by the users themselves with the purpose of signing up to the website, of participating in the “Κερkida OPAP” program and of being respectively informed when they win.

The users are also asked to declare obligatorily whether they are parents/ guardians and have the custody of the child declared in case they win.

The users may optionally declare their team preference and their town of residence, for the optimization of the results of the search for games that are available in program “Κερkida OPAP”. The users may also optionally declare that they wish to have their data processed for the purpose of receiving newsletters: a) by OPAP S.A., b) by the team that they may have declared to be their favorite when stating their preferences.

In particular, if the user decides to connect/ sign up to the website through his/her Facebook or Google+ account, his/her e-mail particulars and the name of the relevant profile are collected for his/her information in case of a win.

By providing the personal data above, the user gives his/her consent to OPAP S.A. to process them for the specific purposes mentioned above.

Furthermore, in case of a win, the users are asked to optionally give their consent to the photographing/ videotaping of the child to whom they are parents/ guardians and of whom they have the custody, within the context of conduct of the “Κερkida OPAP” activations, and to the broadcasting of such photos/ videos through different media.

The use of personal data for any other purpose is only permitted following the prior special consent of the data subject (or of the persons having the custody, when the data subject is a minor), which will be provided in writing and sent to the seat of OPAP S.A. with the indication “For Program Κερkida

OPAP”, or submitted to the representatives/ partners of OPAP during the conduct of the “Κερkida OPAP” activation, or through the relevant form which is posted on website [www.kerkidaopap.gr](http://www.kerkidaopap.gr).

The visitors/ users have the right to withdraw their consent for the processing of their personal data and to request their erasure, at any given moment and for every one of the aforementioned purposes, either by making the changes themselves through the “My account” tab, or by sending a written request or e-mail to OPAP S.A., at [xorigies@opap.gr](mailto:xorigies@opap.gr), to the attention of the Sponsorships Department.

### **Recipients**

The processing of the personal data of the visitors/ users is carried out solely by the competent employees of OPAP S.A. who are duly authorized to this end. In particular, in framework of issuance of the tickets for “Κερkida OPAP” program winners, the personal data of the winners shall also be forwarded to duly authorized employees of EY ZHN LVD SINGLE-MEMBER LTD.

In case the user opts into receiving newsletters by OPAP or by his/her favorite team, recipients of his/her personal data will respectively be either the companies of OPAP Group or his/her favorite team, as declared in his/her preferences.

### **Retention Time**

The users’ personal data, within the framework of their participation in the “Κερkida OPAP” program activation, will be kept by OPAP S.A. for as long as the user account is active and, in any case, for two (2) years after the last activity of the user account.

### **User Rights**

At any given moment, every user holds the right to:

1. access his/her personal data, asking how they are used and who processes them after their collection.
2. withdraw his/her consent or even request the erasure of his/her personal data.
3. in case he/she ascertains that his/her details are incomplete or wrong, request their completion or rectification.
4. restrict the processing of his/her personal data, in the cases specifically set forth in law.

5. receive the data concerning him/her in a structured, commonly used format (e.g. CD-ROM), or request from OPAP S.A. to transmit the data itself to another controller.
6. in case of a data infringement which may result in high risk for the subject's rights and freedoms, be informed in this respect the soonest possible after the acknowledgment of the infringement.
7. resort to the Hellenic Data Protection Authority, in case he/she believes that the protection of his/her personal data is affected in any way.

### **Limitation of Liability**

Website [www.kerkidaopap.gr](http://www.kerkidaopap.gr) allows visitors to send information, however, during transmission of such information, third parties may interfere and acquire access thereto. In any such case, OPAP S.A. shall not be held liable for the eventual unlawful personal data collection or processing by any third party.

Website [www.kerkidaopap.gr](http://www.kerkidaopap.gr) contains hyperlinks to other websites. OPAP S.A. shall not be held liable for any unlawful personal data collection or processing through the said websites.

### **Confidentiality/ Security**

OPAP S.A. allows visitors/ users of website [www.kerkidaopap.gr](http://www.kerkidaopap.gr) to transmit their personal data relating to their identification (identifiers) through a secure transmission method.

OPAP S.A. strictly complies with a specific security policy, while, at the same time, it applies the latest techniques for the protection of personal data kept in its records against:

- Illegal access;
- Illegal use or disclosure;
- Illegal modification;
- Intentional or unintentional destruction.

OPAP S.A. shall bear no responsibility in the event that the personal data kept in its records become subject to illegal acts, which may result in loss or damage, material or non-material one, of the data subjects, due to force majeure or due to any other reason not attributable to gross negligence or fraudulence of OPAP S.A. or of the employees thereof.

OPAP S.A.'s collection and management policy complies with:

- Law 2472/1997;
- Law 2774/1999;
- Law 3471/2006;
- Regulation 679/2016 of the European Union; and
- the decisions of the Hellenic Data Protection Authority.

### **Providing Support**

For any request relating to the processing of personal data, within the framework of operation of website [www.kerkidaopap.gr](http://www.kerkidaopap.gr), of registration in it or of participation in the “Κερκίδα OPAP” program, the users may contact OPAP S.A. using the following details:

“Κερκίδα OPAP”, OPAP Sponsorships Department, [xorigies@opap.gr](mailto:xorigies@opap.gr) and

2105798020

### **Hellenic Data Protection Authority contact details:**

Website: [www.dpa.gr](http://www.dpa.gr)  
Postal Address: 1-3 Kifissias Ave., 115 23, Athens  
Call Center: +30 210 6475600 Fax: +30 210 6475628  
E-mail: [contact@dpa.gr](mailto:contact@dpa.gr)