

# Call Center Privacy Policy

## 1. INTRODUCTION

«SAINT-GOBAIN SEKURIT SERVICE HELLAS SINGLE MEMBER SOCIETE ANONYME» (hereinafter referred to as the "**Company**" or "**we**" or "**us**"), with business registry number 057541504000, with seat in the Municipality of Alimos, Attica, Greece, uses a call center to ensure a proper and efficient customer service for its clients (individuals and legal entities) and other interested parties regarding its services and products.

The call center operates in accordance with the provisions of applicable law, including Law 3471/2006, the General Data Protection Regulation (GDPR), and Law 4624/2019.

## 2. PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

We process personal data in accordance with the applicable principles of the GDPR and ensure that such are:

- (a) processed lawfully, fairly and in a transparent manner;
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- (d) accurate and, where necessary, kept up to date;
- (e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
- (f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## 3. DATA COLLECTED

When you call the Company's call center, the external elements of communication (such as your phone number, the time and duration of the call), as well as the Company's department you were connected with, are recorded.

The content of our telephone conversation, which takes place in the course of a legitimate business practice, is recorded for the purpose of providing evidence of a commercial transaction or other business communication (i.e. to prove that the specific conversation took place and its specific content). In any case, you are informed in advance that your call will be recorded. If necessary for

your service and/or to fulfill our contractual obligations, we also collect additional personal data during our conversation (such as your full name, home/business address, vehicle details, customer contact details). For more information, please refer to our Company's General Privacy Policy.

#### **4. PURPOSES OF PROCESSING AND LEGAL BASIS**

The processing of your personal data is intended to enable the Company to provide better services, fulfill its contractual obligations, and provide evidence of commercial transactions or other business communications. By fulfilling these purposes your interests are also protected. Our call center processes, *inter alia*, requests relating to insurance claims and purchase orders, as well as communications with the accounting department and warehouses.

The legal basis for recording external elements of communication, as well as the content of conversations is the protection of the Company's legitimate interests.

The legal basis for collecting your other personal data is, *inter alia*, the performance of a contract, compliance with a legal obligation, and the protection of the Company's legitimate interests.

#### **5. RIGHTS OF THE DATA SUBJECT**

In accordance with the GDPR and the specific provisions of the law, as data subjects you have the following rights:

- i. Right of access: You have the right to access your personal data and related information. This allows you to know and verify the lawfulness of the processing. Specifically, you have the right to request a copy of the recorded call.
- ii. Right to rectification: You have the right to request the rectification of the personal information we hold about you. This allows you to correct any incomplete or inaccurate information.
- iii. Right to erasure (right to be forgotten): You have the right to request that we erase or remove personal information when there is no legitimate reason for us to continue its processing.
- iv. Right to restriction of processing: You have the right to request that we restrict the processing of your personal information. This allows you to ask us to restrict the processing of your personal information if, for example, you contest the accuracy of the personal data or you consider that the processing is unlawful.
- v. Right to data portability: You have the right to receive and reuse your personal data for your own purposes in a structured, commonly used, and machine-readable format (i.e., a data format that can be read and processed automatically by a computer) and to transmit it to another controller.

vi. Right to object: You have the right to object at any time and for reasons related to your particular situation to the processing of your data, subject to the legal conditions.

vii. Rights related to automated decision-making, including profiling: You have the right to object to profiling and automated decision-making under certain conditions.

## **6. DATA RETENTION PERIOD**

The Company keeps records of recorded calls only for the period of time deemed absolutely necessary for the specific purpose of recording telephone conversations, which has been set at six (6) months from the date of the call.

The retention period for your other data (e.g., name, contact details, vehicle details) varies depending on the purpose of the processing and whether we are acting as the controller or processor. For more information, please refer to our Company's General Privacy Policy.

The above data is not retained beyond the above periods, unless there is a legitimate reason (e.g. notification to retain documents in view of a possible legal dispute or other special circumstance) that requires their further storage.

## **7. RECIPIENTS**

In order for the Company to fulfill the aforementioned purposes, it discloses your data only to Company employees and only to the extent necessary, depending on their position and duties.

Only the Company processes external elements of communication data and the recorded call archive. In order for the call center to operate in the most efficient manner and to be able to handle a large volume of calls, outside the Company's operating hours, an external provider is engaged, to handle the management of calls at certain times/days of the week, acting as the processor. It should be noted that this provider does not have access to external elements of communication or recorded call content, nor records itself the call content. This processing is subject to a written agreement between the Company and the third party in accordance with the requirements of the GDPR, and the Company takes the necessary measures to ensure that these third parties operate in full compliance with the provisions of the GDPR and relevant national legislation.

Your data may, where appropriate, be transferred:

- to national or international regulatory, supervisory, tax, or other authorities or public bodies or courts, when required by law or following a lawful order.

- to external service providers (e.g. external IT and cloud providers) when required for technical purposes, relationship management, and the execution of requested transactions.

Your data is not transferred to a country or territory outside the European Economic Area.

## **8. SECURITY**

The Company implements appropriate technical and organizational measures to ensure an adequate level of security for personal data, taking into account any risks, in compliance with the GDPR and national legislation.

The record of recorded calls is kept by the Company in a fully encrypted form and is protected from unauthorized use.

## **9. CONTACT**

The Company respects your rights regarding your personal data and facilitates their exercise. You can address any request, question, or complaint regarding your personal data or exercise your rights by contacting the Data Protection Officer via email at [privacycontact.Greece@saint-gobain.com](mailto:privacycontact.Greece@saint-gobain.com)

We will respond to your request within thirty (30) days of receipt. If an extension of the above deadline is required to investigate and/or process your request, we will inform you accordingly, explaining the reasons why the extension of the deadline is necessary.

The Company will comply with your request in accordance with the conditions set out in the applicable legislation. The exercise of your rights does not necessarily guarantee their full satisfaction, especially where applicable legal provisions impose limitations. If we are unable to comply with your request, we will inform you about the reasons.

In any case, if you believe that the protection of your personal data has been violated in any way, you have the right to refer the matter to the Hellenic Data Protection Authority. Detailed information on the Authority's capacity and the procedure for submitting a complaint is provided on the Hellenic Data Protection Authority website ([www.dpa.gr](http://www.dpa.gr)).

## **10. AMENDMENTS**

The Company reserves the right to freely amend or update the terms of this policy whenever it is deemed necessary or is required by law and undertakes to inform data subjects of any such amendments by posting the updated policy on its official website.

For more information on the processing of your personal data, please refer to our Company's General Privacy Policy.