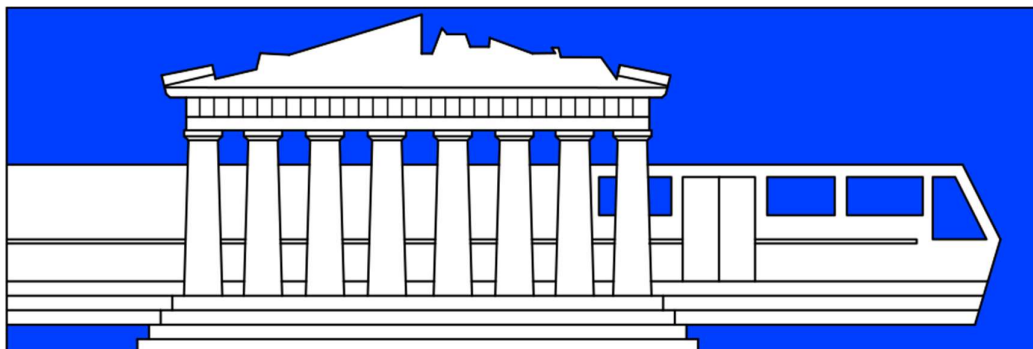




ELLINIKO METRO S.A.

PRIVACY AND PERSONAL DATA PROCESSING POLICY

ELLINIKO METRO S.A.

(To be posted on the website)

Title	Privacy and Personal Data Processing Policy
Owner	Elliniko Metro S.A.
Issuance Date	June 2026

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This website of ELLINIKO METRO S.A. recognizes and respects the right to the protection of internet users' personal data, in accordance with [European Regulation 2016/679](#).

This Policy explains how emetro.gr processes the personal data collected during a visit to and/or use of the website's services and pages. It also explains the obligations of ELLINIKO METRO S.A., as well as the rights of visitors concerning the processing of their personal data. This Policy does not apply to information collected through any other website. Kindly be advised that the emetro.gr website contains links that redirect to other websites, either through hyperlinks or banners. Thus, once you are redirected to a website other than emetro.gr, this Policy will no longer apply. In this case, we recommend that you read the Privacy Policy of the website to which you are redirected.

For any information concerning this Policy and the way we process your personal data, kindly contact the Data Protection Officer (DPO), Mr. Vasilis Dikaoulas, by emailing dpo@emetro.gr.

Data Controller

The Data Controller is ELLINIKO METRO S.A., whose registered offices are situated at 191-193 Messogion Avenue, 115 25 Athens, Email: info@emetro.gr.

What is Personal Data

According to the law, Personal Data consists in any information relating to an identified or identifiable physical entity (the "data subject"), such as full name, email address, mailing address, phone number for contact purposes, tax identification number, etc. An identifiable physical entity is defined as one, whose identity can be ascertained, either directly or indirectly, in particular by reference to an identifier, such as a name, identification number, location data, online identifier (IP address, email, etc.) or to one or more factors specific to their physical, physiological, genetic, psychological, economic, cultural, or social identity.

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What is Personal Data Processing

Personal Data Processing means any operation or sequence of operations performed on personal data whether or not by the use of automated means, such as collection, recording, organization, structuring, storing, adapting, altering, retrieving, seeking for information, using, disclosing to third parties, disseminating, correlating, combining, restricting, erasing, and destroying personal data.

What personal data do we collect and for what purpose

The table below presents the personal data we collect and process, as well as the purpose for which we collect and process it.

Personal Data	Purpose of collecting and processing personal data
• Full name • Email address • Mailing address • Telephone number for contact purposes • IP • and other information that may be included (subject, message, etc.)	Communication with ELLINIKO METRO S.A.'s Public Relations
• Browser type • Operating system • Browsing flow • Internet services provider	Monitoring the website's optimal performance using Google Analytics to evaluate and collect statistical data
• User behavior data (e.g. mouse movements) • Device and Software identifiers • IP Address	Protection Against Malicious Use (Spam & Bots): Use of the Google reCAPTCHA service to secure communication forms

Legal Basis for Personal Data Processing

The legal basis for the processing of personal data depends on their collection purposes. More specifically:

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- **Your consent** when browsing our website, accepting cookies, and/or using the contact form (Article 6, paragraph 1, item a' of the GDPR).
- **The performance of a contract** or preliminary steps toward entering into a contract to which you are a contracting party (Article 6, paragraph 1, item b' of the GDPR).
- **Compliance with a legal obligation** of ELLINIKO METRO S.A. deriving from the applicable Greek and European legislation (Article 6, paragraph 1, item c' of the GDPR).

You may withdraw your consent at any time without affecting the lawfulness of the processing, which was based on your consent prior to its withdrawal.

Cookies and tracking technologies

This website uses cookies and similar technologies to:

- ensure the website's functionality and security;
- improve user's experience;
- collect traffic statistics;
- analyze and optimize the services provided.

Non-essential cookies are installed only further to your consent via the cookie management mechanism (cookie banner).

You can at any time:

- change your cookie preferences;
- withdraw your consent;
- delete cookies through your browser settings.

More information is provided in the website's Cookie Policy.

Google Analytics and international data transfers

The website may use services provided by Google Ireland Ltd., such as Google Analytics, for the purposes of statistical analysis and improvement of the website's functionality.

In this framework, personal data may be transferred to countries outside the European Financial Area, including the United States of America.

These transfers are performed in line with the GDPR requirements and based on appropriate warranties, such as:

- Standard Contractual Clauses – SCCs;
- Adequacy decisions made by the European Commission;
- And/or EU-U.S. Data Privacy Framework, as applicable.

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Use of Google reCAPTCHA

We use Google reCAPTCHA, a service operated by Google Ireland Limited, to protect the contact forms of our website from automated programs and bots. This service analyses the behavior of the website visitor based on various characteristics (e.g. IP address, session duration, mouse movements made by the user) to check whether data is entered on this website by a physical entity. The data collected is transmitted to Google and is processed on the basis of our instructions and the safeguards on international transfers as provided under GDPR.

The processing of your data is carried out on the basis of the legitimate interests of the Company to ensure the cybersecurity of its website and to prevent digital fraud (Article 6, para. 1, f, GDPR), as well as based on your consent obtained through the Cookie Banner for the operation of the relevant scripts.

Recipients of data

The personal data of the recipients and/or users of the website remain confidential and are not transmitted to third parties for commercial or advertising purposes. Access to data may be granted to exclusively authorized associates of the Company, acting as Data Processors on its behalf, such as:

- hosting providers,
- technical support providers,
- cybersecurity providers,
- statistical analysis tools providers,
- responsible public and supervisory authorities, as required by Law.

These associates are contractually bound by confidentiality, security and data protection clauses.

Data Storage duration

Your personal data shall be kept for the duration necessary for their collection purposes or as required by Law. More precisely:

- Personal data stored following your action (e.g. contact form/email transmission, etc.) shall be kept until you withdraw your consent.
- Personal data stored following the execution of a contract shall be kept in writing and in electronic format during its validity period or for as long as it is required until the expiry of the limitation period for any eventual claims.
- Personal data stored following a legal liability shall be kept based on the legislation requirements and for the time period foreseen for the execution of the relevant inspections by the authorities responsible.

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Safety of Data

We safeguard your personal data, having implemented the appropriate organizational and technical measures for their safety and protection against any form of accidental or unauthorized processing.

We use SSL - Secure Socket Layer, in order to ensure safe data sharing between emetro.gr website and your browser.

These measures are re-examined and amended, as necessary.

Your rights

As regards the personal data protection that concerns you, you have the following rights:

- Right to access, i.e. the right to be informed whether personal data that concerns you is being processed;
- Right to rectification, i.e. the right to request that inaccurate personal data be rectified;
- Right to erasure, i.e. the right to request for the erasure of personal data that concerns you;
- Right to restriction of processing when the accuracy of data is contested, is unlawful or for other reasons;
- right to data portability, i.e. your right to request to receive the personal data concerning you in a structured, commonly used and machine-readable format, as well as to transmit this data to another controller;
- right to object to the processing of your personal data, unless compelling legitimate grounds for the processing which override the interests, rights and freedoms apply, and
- right of revocation of your consent at any time.

In order to exercise your rights, you can address yourself to ELLINIKO METRO S.A. by e-mailing to the following electronic address: info@emetro.gr or by mailing to our aforementioned address.

Having verified the legitimacy of your request, we will respond within thirty (30) days as of the receipt of your request. Should it be deemed necessary to extend the aforementioned deadline in order to investigate and/or fulfill your request, we will inform you accordingly, explaining the reasons for which it is necessary to extend the aforementioned deadline.

Right to complaint

Should you consider that your rights are infringed as regards the protection of your personal rights, you have the right to file a complaint before the following authority:

Hellenic Data Protection Authority (HDPA)

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1-3, Kifissias Ave., Athens 11523

Tel. No.: 210 6475600

Website: <https://www.dpa.gr>

The complainants can file their complaint to HDPa electronically via HDPa's [internet portal](#) by filling in the respective electronic form, depending on the type of complaint.

Policy Amendments

This Policy can be amended or updated anytime, particularly for reasons of compliance with the applicable legislative and regulatory framework or due to changes in the functions and services of the website.

The most recent version of the subject Policy will be always available via the Company's website.

Most recent update

Final update: June 2026