

FOKEA Privacy Policy

Effective date: December 3, 2021

SEIL PC operates the <https://pro.fokea.gr> website and the FOKEA mobile application (hereinafter referred to as the "**Service**").

By using the Service, you consent to the collection and use of information in accordance with this policy. We will use the data to provide and improve the Service.

We will constantly inform you of the policies regarding processing (collection, storage, use, disclosure) of Personal Data and the choices associated with them.

I. Definitions

"Service" means the <https://pro.fokea.gr> website and the FOKEA mobile application operated by SEIL PC.

"Personal data" is information that relates to an identified or identifiable individual.

"Usage Data" is data collected automatically either generated by the use of the Service or from the Service infrastructure.

"Cookies" are small files stored on your device (computer or mobile device).

"Data Controller" is the natural or legal person who alone or jointly with others determine the purposes and means in which any personal data is processed.

For the purpose of this Privacy Policy, SEIL PC is a Data Controller of your Personal Data.

"Data Processor" is any natural or legal person who processes the data on behalf of the Data Controller. We may use various Data Processors in order to offer the Service effectively.

"Data Subject" is any living individual who is using the Service and is the subject of Personal Data.

II. Information Collection and Use

We collect several different types of information for various purposes to provide and improve the Service for you.

Types of Data Collected

1. Personal Data

In order to provide the Service, we may ask you to provide us with certain Personal Data that may include, but not limited to:

- a. First name and Family name
- b. Phone number
- c. Address
- d. Email Address.

You can choose to provide a nickname instead of the full name if you wish and not required by the Service you use.

2. Usage Data

We may also collect information that the browser sends whenever you visit the Service or when you access the Service via a mobile device ("**Usage Data**").

This includes information such as the device's Internet Protocol address, type and version of the browser, the visited pages of the Service that you visit, including time, date and duration of visit, page elements (e.g., links) that you click, unique device identifiers and other diagnostic data.

3. Location Data

We use and store information about the location of the device ("**Location Data**") to provide features of the Service and to improve the Service.

You have the option to enable or disable location services when you use the Service. This will disable various functionalities including but not limited to the ability to use the ASSISTANCE/SOS functionality.

4. Tracking & Cookies Data

We use [cookies](#) and similar tracking technologies to track the activity on the Service and we hold certain information. Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Tracking technologies such as web beacons, pixel tags, clear GIFs and scripts may be used to improve the Service.

If you choose to not accept cookies by instructing your browser to refuse all cookies, you may not be able to use some portions of the Service.

Cookies used include but are not limited to:

- a. Session Cookies to operate the Service.
- b. Preference Cookies to remember your preferences and settings.
- c. Security Cookies for security purposes.
- d. Advertising Cookies to present you advertisements that may be relevant.

Cookies we use (Not the real list, TBD)

Cookie Name	Cookie Expires After	Cookie Function
fokea_session	Immediately	Necessary:Session cookies allow users to be recognized within the website so any page changes or item or data selection you do is remembered from page to page.

XSRF-TOKEN	11 months	Necessary: The cookie is automatically generated for each active user session managed by the application. This token is used to verify that the authenticated user is the person actually making the requests to the application.
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III. Use of Data

SEIL PC uses the collected data for various purposes:

- Create and manage your account.
- To provide and maintain the Service.
- To notify you regarding your account or order and/or about changes to the Service.
- To allow you to participate in interactive features of the Service when you choose to.
- To provide customer support.
- To contact you with newsletters, marketing or promotional materials.
- To gather analysis or valuable information so that we can improve the Service.
- To monitor the usage of the Service.
- To detect, prevent and address technical issues .
- Fulfill and manage purchases, orders, payments, and other transactions related to the Service.
- For payment processing purposes and to process payments and refunds.
- As part of fraud detection processes in protecting SEIL PC and our customers from attempts to engage in fraudulent transactions.
- Resolve disputes and troubleshoot problems.
- Respond to product and customer service requests.
- Assist law enforcement and/or respond to judicial or other competent public authorities' requests.
- Compile anonymous statistical data and analysis for use internally or with third parties.

IV. Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR)

SEIL PC may process the Personal Data in the following cases:

- i) To perform a contract with you.
- ii) You have given us permission to do so.
- iii) The processing performed within the framework of our legitimate interests and it is not overridden by your rights.
- iv) To comply with the requirements of the law.

V. Data Retention

SEIL PC will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with legal

obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies. In any case, if there are any pending or upcoming disputes before the court or any other legal proceedings, SEIL PC shall retain your personal data until these proceedings are finally concluded, in any manner whatsoever. In cases where a shorter retention period is required based on the principles of the necessity and / or minimization, then the data will be retained for this period.

SEIL PC will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of the Service, or we are legally obligated to retain this data for longer periods.

VI. Transfer of Data

Information, including Personal Data, may be transferred to — and maintained on — servers located outside of your country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside Greece and choose to provide information to us, please note that we transfer the data, including Personal Data, to Greece and process it there.

The Consent to this Privacy Policy followed by the submission of such information represents your agreement to that transfer.

SEIL PC will take all the steps reasonably necessary to ensure that the data is treated securely and in accordance with this Privacy Policy and no transfer of the Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of the data and other personal information.

VII. Disclosure for Law Enforcement

Under certain circumstances, SEIL PC may be required to disclose your Personal Data if required to do so by law.

VIII. Legal Requirements

SEIL PC may disclose Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation.
- Protect and defend the rights or property of SEIL PC.
- Prevent or investigate possible wrongdoing in connection with the Service.
- Protect the personal safety of users of the Service or the public.
- Protect against legal liability.

IX. Data Security

The security (confidentiality, integrity and availability) of your data is important to us.

We strive to use commercially acceptable means to protect the Personal Data, but since no method of transmission over the Internet or method of electronic storage is 100% secure, we cannot guarantee its absolute security.

X. Data Protection Rights under the General Data Protection Regulation (GDPR)

SEIL PC aims to take reasonable steps to allow you to correct, amend, delete or limit the use of the Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

You have the following Data Protection rights:

- a) You have the right to access, update or delete the information we have on you. You can access, update or request deletion of Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- b) You have the right to have your information rectified if that information is inaccurate or incomplete.
- c) You have the right to object to the processing of your Personal Data.
- d) You have the right to request that we restrict the processing of the personal information.
- e) You have the right to be provided with a copy of the information we have on you. We will provide it in a structured, machine-readable and commonly used format.
- f) You have the right to withdraw your consent at any time where SEIL PC relied on your consent to process the Personal Data.

To ensure the confidentiality of your Personal Data we will ask you to verify your identity before responding to such requests.

You have the right to complain to the Data Protection Authority (www.dpa.gr) about the collection and use of the Personal Data.

XI. Data Processors

We may employ third party companies and individuals to facilitate the Service, provide the Service on our behalf, perform Service-related actions or assist us in analysing how the Service is used.

These third parties may have access to the Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. Any access to the data is to the extent necessary to achieve the intended purpose.

1. Analytics

We may use third-parties to monitor and analyse the use of the Service.

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of the Service. This data is shared with other

Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

2. Advertising

We may use third-parties to serve you with advertisements to help support and maintain the Service.

Google AdSense & DoubleClick Cookie

Google, as a third-party vendor, uses cookies to serve ads on the Service. Google's use of the DoubleClick cookie enables it and its partners to serve ads to the users based on their visit to the Service or other websites on the Internet.

You may opt out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page: [Google Ads Settings](#)

Google may use information (not including your name, address, email address, or telephone number) about your visits to this and other websites in order to provide advertisements about goods and services of interest to you. If you would like more information about this practice and to know your choices about not having this information used by Google, click here. <https://www.google.com/privacy/ads/>

Go to [Your Online Choices](#) to control ads from other ad networks.

3. Behavioral Remarketing

SEIL PC uses remarketing services to advertise on third party websites to you after you visited the Service. We and the third-party vendors use cookies to inform, optimise and serve ads based on the past visits to the Service.

4. Google AdWords

Google AdWords remarketing service is provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the [Google Ads Settings](#) page.

Google recommends installing the [Google Analytics Opt-out Browser Add-on Download Page](#) - Add-on for the web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on [Privacy Policy – Privacy & Terms](#) of Google.

5. Facebook

Facebook remarketing service is provided by Facebook Inc.

Learn more about interest-based advertising from Facebook by visiting : <https://www.facebook.com/help/164968693837950>

To opt-out from Facebook's interest-based ads, follow these instructions from Facebook:

[How can I adjust how ads on Facebook are shown to me based on data about my activity from partners?](#)

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/>

6. Payments

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to the third-party payment processors whose use of your personal information is governed by their Privacy Policy.

These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

Apple Store In-App Payments : Privacy Policy at [Legal - Apple Privacy Policy](#)

Google Play In-App Payments : Privacy Policy at [Privacy Policy – Privacy & Terms](#)

7. Links to Other Sites

The Service may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

XII. Children's Privacy

The Service does not address anyone under the age of 15 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 15. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our systems.

XIII. Changes to This Privacy Policy

We may update the Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will inform you via a notice on the Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

Changes to this Privacy Policy are effective when they are posted on this page.

You are advised to review this Privacy Policy periodically for any changes.

XIV. Contact Us

If you have any questions about this Privacy Policy, please contact us:

email: info@seil.gr

<https://www.pro.fokea.gr/>

<https://www.seil.gr/>

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