Archived copy of https://www.mypay.gr/privacy-policy/ as published on www.mypay.gr. Page created 2023-10-29, last modified 2023-10-29. Text taken unchanged from the website's content store on 11.11.2026.

Privacy Policy

Dated: 01 November 2022

1. **Introduction**

1.1 We are committed to safeguarding the privacy of our website visitors and service users. in this policy we explain how we will handle your personal data.

1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

1.3 Our website incorporates privacy controls which affect how we will process your personal data, such as cookie management (see clause 11).

2. **How we use your personal data**

2.1 In this Section 2 we have set out:

(a) the general categories of personal data that we may process.

(b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data.

(c) the purposes for which we may process personal data. and

(d) the legal bases of the processing.

2.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analyzing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring the use of our products and services and ensuring we comply with our legal obligations.

2.3 We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our products and services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the proper administration of our website and business according to applicable legislation.

2.4 We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, date of birth. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is the proper administration of our website and business according to applicable legislation.

2.5 We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

2.6 We may process information contained in any enquiry you submit to us regarding products and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is that we will always ask for your consent before processing your enquiry data for the aforementioned purposes.

2.7 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

2.8 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is your permission and additionally, the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.9 We may process [information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

2.10 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.11 Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. **Providing your personal data to others**

3.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.

3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

3.3 In addition to the specific disclosures of personal data set out in this Section 3, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we

are subject, or in order to protect your vital interests or the vital interests of another natural person.

4. **International transfers of your personal data**

4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

4.2 We and our other group companies have offices and facilities in *England, Australia, South Africa and new locations are imminent*. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

4.3 The hosting facilities for our website are situated in Frankfurt. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

4.4 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

5. **Retaining and deleting personal data**

5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We will retain and delete your personal data as follows:

(a) *personal data* will be retained for *5 years* following *the date of collection*, at the end of which period it will be deleted from our systems.

5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) the period of retention of *personal data* will be determined based on *our legal obligations*. My Pay will only store information that is requested from us by law for a period of 5 years. The rest of the data held/stored by us will be deleted after the data has been processed in accordance with the General Data Protection Regulation.

5.5 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. **Amendments**

6.1 We may update this policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

6.3 We may notify you of changes to this policy by email.

7. **Your rights**

7.1 In this Section 7, we have summarised the rights that you have under the General Data Protection Regulation. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

(a) the right to access.

(b) the right to rectification.

(c) the right to erasure.

(d) the right to restrict processing.

(e) the right to object to processing.

(f) the right to data portability.

(g) the right to complain to a supervisory authority. and

(h) the right to withdraw consent.

7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include:

(a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.

(b) you withdraw consent to consent-based processing. and

(c) the processing is for direct marketing purposes. and the personal data have been unlawfully processed.

However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary:

(a) for exercising the right of freedom of expression and information.

(b) for compliance with a legal obligation. or

(c) for the establishment, exercise or defense of legal claims.

7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

(a) you contest the accuracy of the personal data.

(b) processing is unlawful but you oppose erasure.

(c) we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims. and

(d) you have objected to processing, pending the verification of that objection.

Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it:

(a) with your consent.

(b) for the establishment, exercise or defense of legal claims.

(c) for the protection of the rights of another natural or legal person. or

(d) for reasons of important public interest.

7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for:

(a) the performance of a task carried out in the public interest or in the exercise of any official authority vested in us. or

(b) the purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.

7.8 You have the right to object to our processing of your personal data for direct marketing purposes including profiling for direct marketing purposes. If you make such an objection, we will cease to process your personal data for this purpose.

7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7.10 To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You

may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.13 You may exercise any of your rights in relation to your personal data by written notice to us.

8. **About cookies**

8.1 A cookie is a file containing an identifier, a string of letters and numbers that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date. a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9. **Cookies that we use**

9.1 We use cookies for the following purposes:

(a) **authentication** – we use cookies to identify you when you visit our website and as you navigate our website.

(b) **status** – we use cookies to help us to determine if you are logged into our website

(c) **personalization** – we use cookies to store information about your preferences and to personalize the website for you.

(d) **security** – we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally.

(e) **analysis** – we use cookies to help us to analyze the use and performance of our website, products and services. and

(f) **cookie consent** – we use cookies to store your preferences in relation to the use of cookies more generally.

10. Cookies used by our service providers

10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

10.2 We use Google Analytics to analyze the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google’s privacy policy is available at: https://www.google.com/policies/privacy/

11. **Managing cookies**

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

(a) https://support.google.com/chrome/answer/95647?hl=en (Chrome).

(b) https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences (Firefox).

(c) http://www.opera.com/help/tutorials/security/cookies/ (Opera).

(d) https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies (Internet Explorer).

(e) https://support.apple.com/kb/PH21411 (Safari). and

(f) https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy (Edge).

11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

11.3 If you block cookies, you may not be able to use all the features on our website.

12. **Our details**

12.1 This website is owned and operated within Mypay S.A.. MyPay is a registered trademark.

12.2 We are registered in …….

12.3 Our principal place of business is as above

12.4 You can contact us:

(a) by post, using the postal address given above.

(b) using our website contact form, for both Customer Support and general inquiries.

(c) by telephone, on the contact number published on our website from time to time.

13. **Data protection officer**

13.1 Our data protection officer’s contact details are: dpo@mypay.gr