

## PRIVACY POLICY AND PROTECTION OF PERSONAL DATA OF THE PLATFORM "KLEEMANN LIVE"

<https://Live.kleemannlifts.com>

The web application "KLEEMANN LIVE" (hereinafter referred to as "Platform") is a commercial subscription product, owned by the company "Kleemann Hellas SA", with headquarters at the Industrial Area of Stavrochori Kilkis, P.O. Box 25, Kilkis, 611 00-Greece, Tel. +30 2341 038 100, email: [legal@kleemannlifts.com](mailto:legal@kleemannlifts.com), VAT Numb.: 094124623, G.E.MI. Numb. 14486435000 (hereinafter "Company"). The Company, acting as Data Controller, collects, stores, uses and generally processes the Personal Data submitted during the visit, registration or use of the Platform.

Upon entering the Platform you are requested to confirm that you are aware of this Policy. Your entry and interaction in the Platform constitutes for us confirmation of you having been informed.

### **About the Platform "KLEEMANN LIVE".**

The "KLEEMANN LIVE" Platform with all its features, operates on the internet as a website at <https://Live.kleemannlifts.com>. In regards to the features of the Platform, you can visit the <https://kleemannlifts.com/content/kleemann-live>, where relevant information material is posted.

Regarding the terms of use of the Platform, the "KLEEMANN LIVE PLATFORM TERMS OF USE", which are posted in the <https://live.kleemannlifts.com/auth/login>, are applicable.

According to the above Terms, the Platform can be accessed by:

- the authorized partner of the Company who is professionally active in the installation and maintenance of elevators and with whom the Company maintains a business-to-business relationship (B2B), as well as his authorized personnel (hereinafter "Customer") and,
- the end user of the elevator connected to the Platform, whether it is a legally designated representative of the co-owners/tenants of the building where the elevator is located, or the owner of the elevator himself, or a tenant, or a building management company (hereinafter "User"). The User maintains a business relationship with the Customer, since the service is provided by the Company only in a B2B environment.

By activating the subscription to the Platform, the Customer is granted the right to create further users who will have either processing access or monitoring access to the services of the Platform, as specifically mentioned in the "KLEEMANN LIVE PLATFORM TERMS OF USE "

### **What is your Personal Data**

The term "Personal Data" refers to information of natural persons, such as name and surname, postal address, e-mail address, telephone number etc., which identify or can identify you (hereinafter "Personal Data" or "Data").

### **What Personal Data the Company collects on the Platform "KLEEMANN LIVE"**

The Company collects from the Customer Data necessary for the operation of the Platform and the billing of the customer's annual subscription fee to it, specifically name, surname, patronym, address, e-mail, telephone number, VAT number, username and password.

Regarding the users designated by the Customer, the Company collects Data provided through the Customer in order to grant them processing or monitoring access and to contact them in case of emergency, specifically name and surname, e-mail, username, password and telephone number.

In addition, if the use of the SIM Card which is provided by the Company is chosen (as described in "TERMS OF USE AND OPERATION OF SIM CARD" which are posted at <https://live.kleemannlifts.com/auth/login> ), the Company additionally collects Data about the location of the SIM Card provided to the Customer and Data about the volume of transferred data and calls made through it.

### **Legal processing**

The Company collects the Data exclusively for the purposes of the services provided by the Platform, as well as the billing of the Customer's subscription fee to the Platform.

The Company will use the Data for the following lawful processing purposes:

- a) for the performance of a contract or pre-contractual relationship;
- b) to serve its legitimate interest;
- c) to fulfil its obligations deriving from legislation.

The Data are kept for as long as it is necessary in order to fulfill the purpose for which the collection has been effected, unless an extension of this time period is required due to legal claims or legal obligations of the Company.

### **Ways in which Lawful Processing will take place (indicatively) :**

1. By managing your calls to seek information so as to fulfill your requests
2. By managing your requests and queries regarding the products/ services of the Platform as well as receiving, updating and responding to your suggestions and comments on the improvement of our products and services.
3. By communicating with our appointed employees for quality assurance purposes and training the Company's personnel or the personnel of your Company on the Platform.
4. By analyzing the traffic of the Platform and improving your experience, as well as to provide you with information as to its best use.

### **What are the principles of collection and processing**

The Company applies the ten Processing Principles of GDPR 2016/679 (legality, objectivity, transparency, purpose limitation, data minimization, accuracy, storage time limitation, integrity, confidentiality and accountability).

The Company protects and safeguards your eight Rights regarding the use of your Personal Data (information, access, rectification, erasure, restriction of processing, portability, objection and non-automated decision-making based on profiles, as specified in Greek law). The above shall apply without any discrimination and shall apply to all processing operations carried out.

### **Transfer of your Data to third parties**

It is possible that the absolutely necessary Data will be processed by partners of the Company or third-party companies for the provision of its services. The Data may indicatively be disclosed to companies supplying and supporting information systems and to companies providing accounting services for the sole purpose of the trouble-free operation of the Platform. In such cases, the partners / third-party companies perform the processing on behalf of the Company and fulfill the obligations arising from GDPR 679/16.

Apart from the above partners or third parties, the Company does not disclose, process or disclose your Data to third parties, except in cases where the notification / transmission is required by the applicable legal framework.

### **Data Processing Security**

The Company does not use cookies when users browse the Platform. It uses session storage and local storage technology, which are both web storage technologies that allow web applications to store data locally within a user's web browser, for the sole purpose of the trouble-free operation of the Platform. The main difference between session storage and local storage is that session storage stores data for a single browsing session, while local storage persists data even after the browser is closed and reopened.

The processing of your Data in any way is permitted only to persons authorized by the Company, employees and partners exclusively for the above mentioned purposes.

The Company has taken the necessary and appropriate organizational and technical measures for the security and protection of Data from any form of accidental or unlawful processing both on a physical level and on a logical security level (indicatively physical security procedures, classified access to data, protection of computer systems, software).

These measures shall be reviewed and amended whenever necessary.

The Company does not approve or authorize any attempt to use our services in a way that could harm, disable, overburden any part of our services or impede anyone who wishes to use our services lawfully.

If the Company determines that unauthorized or improper use is being made of any of our services, it may, without notice, at its sole discretion, take appropriate technical and organizational measures to block messages from a particular domain, email server, or IP address.

The Company has the ability to immediately delete any account that makes use of the services, which in our sole discretion, transmits or is associated with the transmission of any messages that violate this policy.

### **Applicable law**

The applicable law is Greek law, as formulated in accordance with the General Data Protection Regulation 2016/679 / EU, the law 4624/2019, and in general the current national and European legislative and regulatory framework for the protection of personal data. Competent courts for any arising disputes related to your data are the courts of Kilkis, Greece.

## **Rights and Communication**

Regarding your Rights as Data Subjects (access to your Personal Data, rectification of inaccurate Personal Data, erasure/right to be forgotten, portability of your Data, restriction of processing, objection/withdrawal of consent to the processing of your Data) as well as any issue related to the Processing of Personal Data, the "Privacy Policy" which is posted at <https://kleemannlifts.com/privacy-policy> is applicable.

For any related issue you may contact the Company on Tel.: +30 2341 038 100 - Legal Department-email: [legal@kleemannlifts.com](mailto:legal@kleemannlifts.com) address: Klemann Hellas SA Industrial Area Kilkis, P.O. Box. 25, Kilkis, 611 00-Greece (to the attention of Legal department).

This policy is published by the Company in view of the operation of this website and is subject to periodic improvement and revision.

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