



DATA PRIVACY POLICY

“TRAINOSE S.A. PASSENGER AND FREIGHT TRANSPORT SERVICES”

(TRAINOSE)

Scope of the Privacy Policy

“TRAINOSE S.A. PASSENGER AND FREIGHT TRANSPORT SERVICES” (TRAINOSE), member of the FS Group, commits to the protection of privacy of natural persons and ensures the protection of their personal data, whether they are kept electronically in its databases or physically at its premises. In this respect, and in accordance to the existing national and EU legal framework for the protection of personal data, in particular the General Data Protection Regulation (EU) 679/2016 (hereinafter “the Regulation”) TRAINOSE publishes the present lawful, fair and transparent Privacy Policy, in order to provide sufficient information to the natural persons (“data subjects”) on the personal data it collects and further processes in the context of provisions of its services to the public.

The present Privacy Policy shall apply to all premises and/or digital environments and applications of TRAINOSE which are relevant to its activities (indicatively: www.trainose.gr, tickets.trainose.gr, ics.trainose.gr, cargo.trainose.gr, novelog.trainose.gr).

The Company’s full details are:

TRAINOSE S.A. PASSENGER AND FREIGHT TRANSPORT SERVICES

Postal address: 1-3 Karolou str.

E-mail address: dpo@trainose.gr

Contact number: 2130121600

Definitions

For the purposes of this Policy, the following definitions should apply:

‘Personal data’: any information relating to an identified or identifiable natural person (**‘data subject’**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification

number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

'Special categories of personal data': personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;

'Processing': any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

'Anonymization': the processing of personal data in such a way that data can no longer be attributed to a particular data subject;

'Pseudonymization': the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;

'Controller': the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

'Processor': a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

'Consent': of the data subject: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

'Personal data breach': a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

'Existing legislation': The provisions of the existing Greek, EU or other legislation which is applicable to TRAINOSE which regulates matters of data protection, such as:

- Greek Law 4624/2019:Hellenic Data Protection Authority, implementing measures of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of personal data ,
- Greek Law 3471/2006 Law 3471/2006 on the protection of personal data and privacy in the electronic communications sector and amending Law 2472/1997, as amended
- Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications), as amended
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation-GDPR) and any implementing laws.

Principles relating to the processing of personal data

TRAINOSE processes personal data based on the following principles:

1. **Lawfulness, fairness and transparency:** TRAINOSE ensures that personal data are collected and processed lawfully, fairly and in a transparent manner in relation to the data subject.
2. **Purpose limitation:** TRAINOSE ensures that personal data are collected only for specified, explicit and legitimate purposes.
3. **Data minimization:** TRAINOSE takes relevant technical and organizational measures so that personal data will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

4. **Accuracy:** TRAINOSE shall take all necessary steps to ensure that the personal data it collects and processes are always accurate and, where necessary, kept up-to-date.
5. **Storage limitation:** TRAINOSE does not store the personal data it collects for longer than is necessary for the purposes for which the personal data are processed. However, it is possible to keep them for a longer period, when processing is necessary:
 - i) to comply with a legal obligation on the processing;
 - ii) to fulfil a duty carried out for the public interest;
 - iii) for achieving purposes in the public interest;
 - iv) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organizational measures, including pseudonymization, and only where these purposes cannot be achieved through data anonymization;
 - v) for the establishment, exercise or defense of legal claims.
6. **Integrity and confidentiality:** TRAINOSE ensures that personal data are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

Collection of personal data

TRAINOSE may collect personal data either in paper form (e.g. through submission of necessary documentation for the signing of an agreement) or through its websites and applications (e.g. for the issuance of tickets, handling of complaints).

Purposes of Processing – Legal basis

TRAINOSE may collect personal data referring to its passengers, employees and partners in general, in the framework of its operations and activities.

In principle, TRAINOSE may collect and process personal data for the following purposes:

A. Ticket issuance

TRAINOSE, collects and processes passenger data in order to issue tickets, through the regional booking desks as well as through its website trainose.tickets.gr and its relevant *mobile application (TrainoseMobileApp)*.

A.1. Type of data collected:

The passengers' data collected in this context are: name, surname, father's name, contact details (mobile phone number and e-mail address), ID card number.

A.2. Purposes of processing – legal basis:

Personal data are collected and processed for the purposes of:

- Servicing passengers during ticket issuance. The legal basis is that processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract,
- Managing payments, fees and charges. The legal basis is that processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract,
- Managing disputes, collecting and retrieving amounts owned to us. In that case, the legal basis is TRAINOSE's legitimate interest for recovering debts.
- Informing you in case of itinerary modifications/delays/cancellations. In this case, processing of passenger data is necessary for servicing the contractual relationship between TRAINOSE and the passengers, as well as TRAINOSE'S legitimate interest to provide the better service to its passengers.
- Informing you for updates, offers and providing TRAINOSE newsletters, if you provide us with your relevant consent.

B. Transportation of persons with disabilities (PWD)

B.1. Data collected:

In the framework of managing transportation requests regarding PWD, TRAINOSE collects and processes the following personal data: name, surname, e-mail, address, city, district, prefecture, PC, country, telephone contact numbers, date and time of transport, departure and arrival station, itinerary as well as possible collection of health data that the passenger could submit (e.g. use of wheelchair).

B.2. Purposes of processing – legal basis

The purpose of collecting and processing personal data is to better serve passenger needs and is necessary for the performance of a contract between TRAINOSE and a passenger. This includes informing passengers in case of train schedule modifications/delays or/and

cancellations. In case that sensitive personal data are provided (e.g. health data), their provision is based on the passengers' explicit consent.

C. Transfer of unaccompanied and small parcels

C.1. Data collected:

If you chose to use TRAINOSE services for the transfer of unaccompanied and small parcels, we will collect the following personal data from both sender and recipient: name, surname, telephone number, address, ID card number.

C.2. Purposes of processing – legal basis:

We collect and process the data you will be submitting in order to provide you parcel transfer services. Data processing is necessary for the performance of the contract to which you are party and its proper execution through the necessary identification of the implicated parties.

D. Transfer of goods and parcels

D.1. Data collected:

If you wish to use TRAINOSE services for the expedition of goods and parcels, either solely by rail transport ("terminal to terminal") either through integrated transfer services ("door to door»), you can submit your transfer order through the electronic order platforms of TRAINOSE (available through the links: www.trainose.gr/ics, cargo.trainose.gr, και novelog.trainose.gr). To complete the order, you will need to provide some necessary sender and recipient details: Name, surname, contact number, affiliation, sender's and recipient's address, invoicing details (IBAN, Tax identification number, tax authority).

D.2. Purposes of processing – legal basis:

We collect and process the information you submit in order to provide you goods and parcel transfer services. Data processing is necessary for the performance of the contract to which you are party.

E. Job Applicants

E.1. Data collected:

TRAINOSE collects and processes data of job applicants following the candidate's relevant application for a job vacancy. In this case, TRAINOSE collects and processes only the personal information that are necessary to evaluate the candidate's suitability for the specific position (e.g. name, surname, contact details, education, professional experience etc.). The data are collected when submitting the application by any means (e.g. by sending an e-mail to the Company's relevant e-mail address, as announced in the relevant announcement, through recruitment platforms), as well as through the documents attached to your application (e.g. CV, certificates, etc.). In addition, through the application evaluation procedure, the Company may use further questionnaires, which reveal information about the candidates, in order to further assess their suitability for the specific position. If the job application includes contact details of previous employers, TRAINOSE may contact them in order to receive information concerning uniquely the position and the applicant's capacity/ability to fulfill the requirements.

E.2. Purposes of processing – legal basis

Data collection is performed with the purpose of:

- Evaluating the candidate's suitability for the specific position. The legal basis is TRAINOSE's legitimate interest.
- Contacting previous employees, whose details the candidates have provided for this reason. The legal basis is the candidate's consent..

F. Employees

F.1. Data collected:

TRAINOSE collects and process personal information relevant to the working relationship, as defined in the relevant collective or individual employment contract. Among others, these data could include name, surname, date of birth, place of birth, sex, nationality, residence, e-mail address, telephone contact numbers, ID card number, Tax identification number, IBAN, CV, education certificate(s), health and marital status, details of dependent family members, details concerning education and training, professional experience, in the framework of TRAINOSE's obligations as an employer.

F.2. Purposes of processing – legal basis

Employees' data are collected with the purpose of:

- Managing the working relationship. Data processing is necessary for the performance of the labor agreement.
- Fulfilling TRAINOSE's obligations as an employer. Data processing is necessary for TRAINOSE's compliance with a legal obligation.

G. Image and Sound Data

TRAINOSE may use video-surveillance systems in its premises and facilities for security reasons. Also, in certain cases, TRAINOSE may record telephone calls of its clients – passengers, following their adequate notification on this processing.

G.1. Data collected:

- Image data: TRAINOSE collects, processes and stores image data through its video-surveillance systems, where applied, for the purpose of ensuring the security of its premises, by respecting the standards and requirements provided by national and union legislation on the retention of sound and image data.

- Sound data: TRAINOSE in certain cases and following prior notification of the data subjects, may record clients' telephone calls, in order to provide better services, with respect to the conditions provided by national and union legislation on the retention of sound and image data.

G.2. Purposes of processing – legal basis

TRAINOSE collects and processes data for the following purposes:

- Image data, in order to ensure the security of its premises, equipment and natural persons. The legal basis for processing is the legitimate interest for its security.

- Sound data, in order to guarantee the communication security and to provide better services to its clients, following the data subject's notification. The legal basis for processing is TRAINOSE's legitimate interest.

H. Data collected from TRAINOSE's websites or other online platforms

H.1. Data collected:

When you use TRAINOSE's websites, the following information is collected:

- By subscribing to the Company's newsletter, we collect your e-mail address.

H.2. Purposes of processing – legal basis:

Data are collected for the purposes of:

- By subscribing to the Company's newsletter, in order to inform you for our news and offers. Processing is based on your consent, if you provide it.

I. Data collected through the mobile application TrainoseApp

I.1. Data collected:

TRAINOSE collects information you provide when using or subscribing to the mobile application, like name, surname, father's name (optional), mother's name (optional), e-mail address, mobile phone number, phone number (optional), train station in proximity. Your subscription is optional. If you chose not to subscribe, you will be requested to provide the following information for the purposes of issuing a ticket: name, surname, e-mail address, type of ticket (e.g. full fare, student ticket, children's ticket etc.), mobile phone number, credit card number.

I.2. Purposes of processing – legal basis

TRAINOSE collects the data you provide for the following purposes:

- Providing mobile application services and helping you through your navigation. The legal basis for processing is the legitimate interest.
- Creating an account. We will process your data if you provide us with your consent.
- Completing the purchase of a ticket. In that case, the legal basis is the contract between us.
- Managing payments, fees and charges. The legal basis is that processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract.
- Managing disputes, collecting and retrieving amounts owned to us. In that case, the legal basis for processing is TRAINOSE's legitimate interest for debt recovery.
- Informing you in case of itinerary modifications/delays/cancellations. In this case, processing of passenger data is necessary for servicing the contractual relationship between TRAINOSE and the passengers, as well as TRAINOSE'S legitimate interest to provide better service to its passengers.

J. Online technologies

J.1. Data collected:

TRAI NOSE collects only the information necessary and in relation for the issuance of tickets and the overall rate of visitors of the TRAI NOSE's websites, as for example the Internet Protocol Address (IP Address) and the type of browser used by the visitor, cookies, invisible pixels and web beacons in order to receive information on the browsing sessions. Further relevant information is documented in TRAI NOSE's [Cookies' Policy](#).

J.2 Purposes of processing – legal basis:

TRAI NOSE is using:

- Owner cookies concerning our websites' and platform's operation. These cookies are necessary for the use of our websites or/and platform. The legal basis of processing is TRAI NOSE's legitimate interest for normal operation of the relevant websites/platforms.
- For any other form of cookies or of any other technology we use, the legal basis for processing is your consent.

For more information regarding the use of cookies, please read our Website [Cookies' Policy](#).

K. Partners'/ Tenders' Data

K.1. Data collected:

The details collected are the following: name and surname, contact phone number, address, TIN, ID card number, as well as any further information required by national legislation (e.g. tax and insurance law).

K.2. Purposes of processing - legal basis:

TRAI NOSE collects and process personal data in order to lawfully conclude contracts and respond to the legal obligations imposed. In this case, partners' data processing takes place for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract, as well as for the compliance of TRAI NOSE with its legal obligations (e.g. tax obligations).

L. Complaint management

L.1. Data collected:

TRAI NOSE collects and processes the data provided by clients when submitting a complaint through a phone call, by filling out the relevant form in the Company's premises and agencies, or by submitting a complaint online through the website www.trainose.gr. The data collected are: name, surname, email, address, city, district, prefecture, PC, country, telephone contact numbers, date and time of transportation, departure and arrival station, itinerary.

L.2. Purposes of processing – legal basis:

TRAI NOSE collects and processes the data you submit in order to handle requests/complaints submitted by its passengers. In that case, the legal basis for processing is the Company's legitimate interest. We may receive sensitive personal data, only if you submit them at your own initiative, while for any further processing of those data, we make sure to receive your prior written consent.

M. Lost and found objects

M.1. Data collected:

In the framework of managing lost and found objects, TRAI NOSE may collect and process data as: name and surname of the employee that delivered/received the object, name and surname, address, telephone number, ID card/passport number of the person that found the object, name and surname, ID card/passport number, address, telephone number and signature of the client/owner of the object.

M.2. Purpose of processing – legal basis:

TRAI NOSE collects and processes the above data in order to handle reports for lost and found objects of its passengers. In this case, the legal basis for processing is the legitimate interest of the Company and the passenger.

Minors' Data

Requesting or receiving minors' personal data is not a part of TRAI NOSE's Policy (i.e. from individuals that have not reached the age of 18 years old), either directly or indirectly through third parties, further than the data concerning ticket booking and ticket issuance, as well as cases concerning data of children, as protected and dependent members of insured parents.

However, given that it is impossible to always control the age of individuals entering or using the websites of TRAINOSE, parents and legal guardians are advised to contact directly TRAINOSE in case they observe any unauthorized disclosure of data on behalf of the minors for whom they are responsible, in order to exercise their rights accordingly, as e.g. the erasure of their data.

Disclaimer for third-party websites

TRAINOSE websites may include links, which redirect to third-parties' websites. TRAINOSE does not control those websites and is not responsible for the content posted on them or any further links appearing on them. TRAINOSE is not responsible for third-parties' privacy practices or for their websites' content.

Transfer of personal data

TRAINOSE may transfer personal data to third parties (legal entities or individuals) when provided by existing law as an obligation, or, alternatively pursuant to the guarantees set by the existing legislation. More specifically, in the context of pursuance of the processing purposes, personal data may be transferred to:

- Third companies which provide to TRAINOSE relevant services (e.g. ticket agents, finance or technical support, payroll, etc.). In any case, all these companies are contractually bound with TRAINOSE in order to ensure the observance of confidentiality, as well as of all obligations provided in the legislation on data protection.
- Companies of OSE Group, to the extent that this transfer is necessary for the satisfaction of data subject's requests and fulfilment of TRAINOSE's purposes and upon prior data subjects' notification and consent (where necessary).
- Public authorities and other supervisory authorities (Police, prosecuting authorities, tax authorities etc..) in the context of issuance of fines, or upon relevant request, following the legal procedures.

Where the transfer of data concerns a country outside the European Union (EU) or the European Economic Area (EEA), TRAINOSE always checks whether:

- The Commission has issued an adequacy decision on the third country to which the transfer is addressed to.
- Appropriate safeguards are in place in accordance with the Regulation for the transfer of such data.

In any other case, the transfer to a third country is not allowed and TRAINOSE may not transfer personal data unless any of the specific derogations provided for in the Regulation apply (e.g. explicit consent of the data subject, upon informing him/her on the risks of the transfer, the transfer is necessary for the performance of a contract at the request of the subject, there are reasons of public interest, it is necessary to support the legal claims and the vital interests of the subject etc.).

Data retention period

All personal data collected and processed by TRAINOSE are retained for a pre-determined and specified period of time, depending of the purpose of processing. When this time period expires, the personal data are safely deleted and/or destroyed, unless their further retention is permitted or required by law.

Personal Data Breach

“Personal data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed by TRAINOSE.

TRAINOSE implements a specific procedure to handle data security breaches.

In case that you realize or suspect that a data breach may have occurred, we kindly ask you to inform without any delay TRAINOSE at: dpo@trainose.gr.

Data Protection Officer

TRAINOSE has appointed a Data Protection Officer (DPO). The contact details are as follows:

Tel: 2130121600

Email: dpo@trainose.gr

Data Subject Rights

TRAINOSE shall ensure and take the appropriate measures for the data subjects to be able to exercise their rights, as provided by national and Union legislation regarding the collection and processing of personal data concerning them. Each data subject has the following rights:

- (i) Right to withdraw his/her consent

In cases where the processing is based solely on your prior consent, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing performed based on consent before its withdrawal.

(ii) The Right of Access and Information

You have the right to request access to and receive a copy of the personal data we maintain for you and verify the lawfulness of the processing.

(iii) The Right of rectification

You have the right to complete, rectify, update or modify your personal data.

(iv) The right to erasure ("the right to be forgotten")

You have the right to submit a request for erasure of your personal data if you do not wish your data to be processed and if there is no legitimate reason for further retention by TRAINOSE.

(v) The right to restriction of processing

You have the right to request restriction of the processing of your personal data, when (a) you claim the inaccuracy of your data and during the review of your request by TRAINOSE, (b) the processing is illegal, (c) the data is no longer necessary for the purpose of processing but you request their retention in order to exercise and defend your legal claims (d) you have exercised the right to object and while we review TRAINOSE's overriding legitimate interest in continuing the processing.

(vi) The right to data portability

You have the right to receive your personal data in a structured, commonly used and machine-readable format (pdf, word, etc.) free of charge upon your identification. You also have the right to request us, if technically possible, to transfer the data directly to another Data Controller.

(vii) The right to object to the processing and the right to object to automated individual decision-making, including profiling.

You have the right to object at any time to the collection and processing of your personal data, where this is necessary for the purposes of legitimate interests we seek as Data Controllers, as well as in cases of processing for purposes of direct marketing and consumer

profiling. It should be noted, however, that TRAINOSE does not use automated decision-making processes.

TRAINOSE may refuse to fully or partially satisfy a data subject's request only when this possibility is provided for by the Regulation or by national law.

TRAINOSE provides the data subject with information on the processing operations within one (1) month from the submission of the data subject's relevant request and following the data subject's identification. This period provided can be extended by two (2) more months, if necessary, if the request is complex or in case of numerous requests. In this case, TRAINOSE is obliged, within one month of the receipt of that request, to inform the data subject about the delay and the reasons of the delay. Within that period, TRAINOSE shall also inform the data subject of possible refusal to fully or partially satisfy the request as well as for the motives of the refusal.

If the data subject submits the request by electronic means, the information shall be provided, if possible, by electronic means, unless the data subject requests differently.

If the data subject's request is manifestly unfounded or excessive, in particular because of its repetitive character, TRAINOSE may charge a reasonable fee in order to satisfy the request or refuse to respond to the request.

To exercise any of the above rights, you can contact the Data Protection Officer of TRAINOSE (dpo@trainose.gr).

Right to Lodge a complaint with the Hellenic Data Protection Authority

Data subjects have the right lodge a complaint with the Hellenic Data Protection Authority (DPA) for issues concerning the processing of their personal data. For the Authority's competence and the means of filing a complaint, detailed information is provided on the website of the DPA (HYPERLINK "<http://www.dpa.gr>" www.dpa.gr "My Rights ☒ Submitting a Complaint").

Updates to the Privacy Policy

TRAINOSE may revise this Privacy Policy from time to time for compliance reasons or to meet its operational needs and legal obligations. Updated versions will be uploaded to our website, with data reference, so that you are always aware of when our Privacy Policy was last updated.

Update: August 2020