

## **GDPR Privacy Notice for Suppliers**

TOR Hotel Group (THG) is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

We may update this notice at any time and an up to date copy can be found on our website.

### **The Kind of Information We Hold About You**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Bank account details.
- Location of workplace.

### **How is Your Personal Information Collected?**

We will collect personal information in the course of job-related activities throughout the period of you working with us.

### **How We Will Use Information about You**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

*We may also use your personal information in the following situations, which are likely to be rare:*

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

The situations in which we will process your personal information are listed below.

- Paying you.
- Administering the contract, we have entered into with you.
- Dealing with legal disputes including accidents at work.
- Complying with health and safety obligations.
- To prevent fraud.

*If you fail to provide certain information when requested, we may not be able to perform the contract we have entered with you (such as paying you), or we may be prevented from complying with our legal obligations.*

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. We will not share your data with any third parties unless we have your prior consent to do so.

### **Why Might You Share My Personal Information with Third Parties?**

We may share your personal information with third parties where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

### **Data Security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also have implemented measures to maintain the ongoing confidentiality, integrity and availability of the systems and services that process personal information, and will restore the availability and access to data in a timely manner in the event of a physical or technical incident. In addition, we limit access to your personal information to those employees who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Our retention periods are based on business needs and your information that is no longer needed is either irreversibly anonymised or destroyed securely. Where we don't need to keep all of your information in full, we will obfuscate or aggregate it. This is to ensure that we do not retain your information for any longer than is necessary.

### **How Long Will You Use My Information For?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider

the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We may keep data longer if we have a legal obligation to keep it or to maintain necessary records for legal, financial, compliance, or other reporting obligations, and to enforce our rights and agreements. We also may keep data about you for statistical analysis or research purposes.

### **Rights of Access, Correction, Erasure, and Restriction**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the HR manager in writing.

*You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive.*

### **What We May Need from You**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is

another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to Withdraw Consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Officer at [info@rhetor.gr](mailto:info@rhetor.gr) OR our customer services team at [privacy@torhotelgroup.gr](mailto:privacy@torhotelgroup.gr).

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Data Protection Officer**

We have appointed a manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our Data Protection Officer at [info@rhetor.gr](mailto:info@rhetor.gr) OR our customer services team at [privacy@torhotelgroup.gr](mailto:privacy@torhotelgroup.gr).

**Make a complaint:** *You may make a complaint about our data processing activities to a supervisory authority, for Greece this is the Hellenic Data Protection Authority at [www.dpa.gr](http://www.dpa.gr).*

### **Changes to this Privacy Notice**

*This Privacy Policy was last amended on 25 September 2018*

We reserve the right to update this privacy notice at any time.

- We may modify this Privacy Policy from time to time. If we decide to update our Privacy notice we will notify you by means of notice on our site homepage.
- If we materially change the way in which we process your personal data, we will provide you with prior notice, or where legally required, request your consent prior to implementing such changes.
- We strongly encourage you to read our privacy notice and keep yourself informed of our practices.

If you have any questions about this privacy notice, please contact the contact our Data Protection Officer at [info@rhetor.gr](mailto:info@rhetor.gr) OR our customer services team at [privacy@torhotelgroup.gr](mailto:privacy@torhotelgroup.gr)

*If you contact us with a privacy complaint it will be assessed with the aim of resolving the issue in a timely and effective manner.*