

GDPR	Code No: 01.01
Corporate Procedure	Valid from: 01.06.2020
Employees Privacy Notice	Revision No: 1
	Page 0 of 9



Employees Privacy Notice

GDPR	Code No: 01.01
Corporate Procedure	Valid from: 01.06.2020
Employees Privacy Notice	Revision No: 1
	Page 1 of 9



Revision history

Date	Rev. No.	Description of Revision	Revision Author	Approved by
25.05.2018	0	New document	Name Surname	Name Surname
01.06.2020	1	New DPO details	Amy Demou	n/a

Summary

This document describes how Frigoglass processes the personal data of its employees, the purposes of such processing, the rights granted to employees by law, and other information about Frigoglass compliance with the applicable regulatory requirements

Scope

Active and non-active employees, including interns (hereinafter referred to as "Employees") of the Frigoglass Group ("Frigoglass").

Related Documents

Data Protection Policy

Data Retention & Disposal Policy

Data Subject Requests Handling Process

GDPR	Code No: 01.01
Corporate Procedure	Valid from: 01.06.2020
Employees Privacy Notice	Revision No: 1
	Page 2 of 9



Contents

Principles governing processing	3
On which legal basis do we process your data?.....	3
Which data do we process	4
Categories of data	4
Special categories of data.....	5
For which purposes do we process your data?.....	6
Who receives and processes your information	7
For how long do we keep your data?	7
Your rights	8
How to exercise your rights	9
Document Revision	9

GDPR	Code No: 01.01
Corporate Procedure	Valid from: 01.06.2020
Employees Privacy Notice	Revision No: 1
	Page 3 of 9



Principles governing processing

The protection of personal data is very important to Frigoglass. We ensure full compliance with the applicable Data Protection Framework, including the General Data Protection Regulation (GDPR), and process personal data in accordance with applicable principles. In this context, we ensure that personal data are:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
- g) shall not be transferred to a country or territory outside the European Economic Area unless the country or territory in question provides an adequate level of protection of the data subjects' rights and freedoms with respect to the processing of personal data or transfers subject to appropriate safeguards; or fulfill other specific conditions laid down in the applicable legislation.

On which legal basis do we process your data?

Processing of personal data of Employees by Frigoglass is justified according to one (or more) of the following legal bases:

- **Contract:** processing is necessary for the performance of the employment contract or in order to take steps at your request prior to entering into a contract;
- **Legal obligation:** processing is necessary to comply with the obligations imposed to us by law (not including obligations under the employment contract). For example, we have a legal obligation to collect and disclose employee data to tax authorities.

GDPR	Code No: 01.01
Corporate Procedure	Valid from: 01.06.2020
Employees Privacy Notice	Revision No: 1
	Page 4 of 9



- **Legitimate interest:** processing is necessary for the purposes of the legitimate interests pursued by Frigoglass or by a third party, except where such interests are overridden by the interests of the employees. For example, processing is necessary to ensure uninterrupted operation of our electronic systems or to manage expenses or to manage our relationships with customers.
- **Vital interests:** processing is necessary in order to protect the life or the vital interests of a natural person.
- **Obligations or rights in the field of employment and social security and social protection law:** processing special categories of employees' data is necessary for the purposes of carrying out the obligations and exercising specific rights of the employee or of Frigoglass in the field of employment and social security and social protection law, under the conditions laid down by law.
- **Working capacity of the employee:** processing is necessary for the purposes of the assessment of the working capacity of the employee.
- **Establishment, exercise or defence of legal claims:** processing is based on our right to establish, exercise or defence legal claims.
- **Consent:** in cases where it is required by law or where none of the above legal bases applies, Frigoglass will lawfully process data upon Employee's written consent, which will be distinguished from the employment contract. Consent will be given upon informing the Employee. The Employee will have the option to freely and voluntarily choose to provide his / her consent and will be able to revoke it at any time without having a negative impact.

Which data do we process

Categories of data

Frigoglass collects the following data categories for its Employees:

- Data identifying the Employee (name, surname, name and surname of parents, date and place of birth, gender, nationality, identity or passport or residence permit, identity number and issuing authority, work permit, Frigoglass employee number)
- Contact details (address, phone, email)
- Information necessary to meet Frigoglass's obligations to tax authorities, social security funds and bodies for the protection and benefits of workers and the unemployed (tax identification number, social security number, registration number of other national authorities and bodies)
- Employees' marital status information (married / single, and other personal data related to spouse and children)
- Information necessary to pay Employee's wages (bank account, number of days and hours of work / leave, reasons for leave, medical certificates when sick leave, pregnancy or childbirth)

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GDPR	Code No: 01.01
Corporate Procedure	Valid from: 01.06.2020
Employees Privacy Notice	Revision No: 1
	Page 5 of 9



- Information regarding the employee's education and professional experience (eg previous work experience, years of service, academic titles, certifications, seminars, knowledge of foreign languages, knowledge of computer programs)
- Electronic identification data (email, account names, account login time / duration, security logs, antivirus logs, access rights, IP address, application activity, browsing history, image capture in closed-circuit television)
- Data relating to benefits to Employees (participation in group insurance scheme and dependent members' data)
- Business Employee Expenses (business mobile phone, car plates, name of other car drivers, driving license, business expenses for travel/transport, accommodation etc.)
- Data related to human resources management (performance evaluation, achievement of targets)
- Professional details (position, role, signature). When the Employee is appointed to represent Frigoglass before authorities, organizations or credit institutions, additional personal data are collected (tax authority documents, proof of residence, documents certifying the professional qualification of the Employee, certifications)

When you provide Frigoglass with third party information (details of relatives, spouses, children, contact persons, etc.), you must inform them of the disclosure of their information to Frigoglass and provide them with a copy of this privacy statement.

Special categories of data

Frigoglass may request that personal health data be disclosed when such data are strictly necessary for Frigoglass to assess Employee's working capacity for a specific role, whether present or future, to meet health and safety requirements related to Employees and for the establishment of Employees' rights and the corresponding return of social benefits.

Frigoglass may request that you carry out medical tests or psychological or psychometric tests when this is justified and necessary for the assessment of Employee's working capacity for a particular role or specific duties.

Data on criminal offenses and convictions may be requested by Frigoglass when it is necessary to assess the Employee's working capacity for a particular role or specific duties or if required by law to be collected under the employment relationship.

In the above cases, we will inform you specifically explaining the reasons why it is necessary to collect your data.

GDPR	Code No: 01.01
Corporate Procedure	Valid from: 01.06.2020
Employees Privacy Notice	Revision No: 1
	Page 6 of 9



For which purposes do we process your data?

We process your data only for specific purposes and only as much data as is necessary for these purposes. In particular, we process your data:

- To complete the recruitment process and to assess whether a particular Employer is fit for a particular role or specific tasks.
- To fulfill our obligations under the employment contract or the law, such as to pay wages, to grant days of leave, to granting benefits, to ensure Employees' health and safety in the workplace, to offer the benefits provided for in the employment contract, to disclosure, when required, Employee data to tax authorities, social security organizations, employee protection organizations, regulatory authorities that audit and regulate the operation of the company.
- To manage human resources, such to define duties, evaluate work performance, estimate wage and benefit costs, to administer Employees' participation in group insurance programs or in events we organize for Employees.
- To manage business expenses, such as business travel expenses, expenses related to the use of business mobile phones, the use of tool cars, transport expenses.
- To organize and execute Frigoglass's operations, such as to perform payments, manage our relationship with customers and shareholders, existing or future.
- To improve production processes.
- To ensure the safety of employees and the safety of critical facilities of Frigoglass.
- To provide training and information.
- To manage and secure Frigoglass's electronic infrastructure and business continuity
- To meet our statutory obligations regarding Employees or Product Specifications.
- For purposes of auditing Frigoglass's procedures from authorities and third parties and / or obtain certifications.
- To reply to official requests from the authorities.

GDPR	Code No: 01.01
Corporate Procedure	Valid from: 01.06.2020
Employees Privacy Notice	Revision No: 1
	Page 7 of 9



Who receives and processes your information

Within Frigoglass, other Frigoglass employees have access to your data. Access is graded according to their position and duties and is limited to the data necessary for the purposes of the particular processing they have undertaken.

We may transfer your data to other Frigoglass Group companies when this is necessary for the purposes of this processing. In these cases, the other company will either act as a controller, determining the means and the purposes of the processing, or act as a processor on behalf of Frigoglass. In both cases, this privacy statement applies.

Out of Frigoglass, we transfer as much data as necessary for the purposes of each processing to the following categories of recipients:

- to third parties providing services to us, such as IT companies, payroll companies, telecommunication companies, seminar and training companies, credit institutions, tax and legal advisers, security companies, insurance companies and other service providers (e.g. vouchers providers). A full list of third parties is available upon request.
- to national or international regulatory, tax or other authorities or public bodies or courts, where required by law or regulation or upon an official order
- to clients and / or partners when required to communicate with them, manage our relationship and execute requested transactions
- to third parties who carry out inspections on us in the framework of our regulatory obligations, customer relationship or obligations under applicable law

As part of our activities, we will have to transfer or disclose certain data, such as your business contact information, position, role, training and experience to authorities, customers and third parties established outside the European Economic Area (EEA). In these cases, Frigoglass ensures that the transfer is made on the basis of appropriate safeguards and in accordance with applicable data protection laws, in order to maintain the required level of protection of your data.

For how long do we keep your data?

Active Employees' Data are retained throughout the employment contract. Non-active Employees' data are retained according to the [Data Retention & Disposal Policy](#). Frigoglass takes care of and applies the appropriate measures to safely store your data during the retention period and to destroy it appropriately after it has been completed. For more information, we suggest reading the [Data Retention & Disposal Policy](#).

GDPR	Code No: 01.01
Corporate Procedure	Valid from: 01.06.2020
Employees Privacy Notice	Revision No: 1
	Page 8 of 9



Your rights

You have the following rights regarding your personal data:	
Right to be informed	You have the right to be informed about the collection and use of your personal data.
Right of Access	You have the right to obtain from Frigoglass confirmation as to whether or not Personal Data concerning you are being processed, and, where that is the case, access to the Personal Data in a concise, intelligible, transparent, and easily accessible form.
Right to Rectification	You have the right to obtain from Frigoglass without undue delay the rectification of inaccurate or the completion of incomplete personal data concerning you, including by means of providing a supplementary statement.
Right to Erasure	You have the right to obtain from Frigoglass the erasure of personal data concerning you without undue delay and Frigoglass shall have the obligation to erase personal data without undue under the conditions laid down by law.
Right to Restriction	You have the right to obtain from Frigoglass restriction of processing only to specific purposes, under the conditions laid down by law.
Right to Object	You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you. Frigoglass shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
Right to Portability	You have the right to receive the personal data concerning you, which you have provided to Frigoglass, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from Frigoglass under the conditions laid down by law.
Right to Obtain Human Intervention	You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Frigoglass will satisfy your request under the conditions set forth by law. The possibility of exercising a right conferred by the law does not always mean that it can be fully satisfied, especially when other legal provisions restrict it. In case we are unable to meet your request, we will inform you about the reasons.

GDPR	Code No: 01.01
Corporate Procedure	Valid from: 01.06.2020
Employees Privacy Notice	Revision No: 1
	Page 9 of 9



How to exercise your rights

Frigoglass respects the rights you have regarding your personal data and facilitates their exercise. You may address any claim, question or complaint about your personal data by contacting the Data Protection Officer by phone on [+30 210 6165803](tel:+302106165803) or by email at DataProtectionOfficer@frigoglass.com. For a faster and better service of claims related to your rights, we suggest that you complete the Data Subject Request Form, which is available at the Human Resources Department and in electronic form in our Frigoglass website. (www.frigoglass.com)

We will respond to your request within thirty (30) days of receipt. If an extension of this deadline is required to investigate and / or process your request, we will let you know, explaining why it is necessary to extend the deadline.

In any case, if you feel that your privacy has been infringed in any way, you have the right to lodge a complaint to the Hellenic Data Protection Authority (www.dpa.gr)

Document Revision

This document, and all documents related to this policy, is periodically reviewed and revised where appropriate by the Data Protection Officer according to Data Protection Policy.