

General Personal Data Protection Policy

Trade Estates REIC, headquartered in Marousi, Attica, 3 Ch. Sabbagh S. Khoury, 15125, is the Data Controller of the personal data of its customers and visitors, processed in accordance with this Policy.

1. Collection and Processing of Data

TRADE ESTATES (TE) collects personal data mainly from data subjects themselves, namely customers, visitors to its retail parks and employees of tenant companies operating within its premises. All personal data are collected for lawful purposes and processed in compliance with Regulation (EU) 2016/679 (GDPR) and applicable Greek legislation. Data subjects are informed transparently regarding processing purposes, recipients, rights, security measures and communication channels.

2. Legal Basis for Processing

The legal basis for each processing activity is communicated prior to the provision of the relevant service. Processing may be necessary for contract performance, compliance with legal obligations, legitimate interests including customer communications and operation of CCTV systems for security purposes, or where required by law.

Data Accuracy and Updates

The Company takes all reasonable measures to ensure personal data remain accurate and up to date and to promptly rectify or delete inaccurate information.

Types of Data and Recipients

Depending on the service used, individuals are informed of the categories of personal data collected and any recipients other than the Company.

Data Subject Rights

Data subjects may exercise their rights of information, access, rectification, erasure, restriction, objection and data portability under Articles 12–23 GDPR and applicable legislation by contacting dpo@trade-estates.gr. Requests are generally handled within one month, subject to identity verification where required.

Retention Period

Personal data are retained for six (6) months unless a different retention period has been communicated for a specific processing activity. Marketing data are retained until an objection or opt-out is received. Certain data may be retained longer where necessary for legal claims or compliance purposes.

Special Categories of Data

The Company does not generally require special category data. CCTV footage is retained for 15 days, unless an incident requires retention for up to three (3) months.

Transparency



For information regarding personal data processing, individuals may contact the Data Protection Officer (DPO) at dpo@trade-estates.gr. Complaints may also be submitted to the Hellenic Data Protection Authority (www.dpa.gr, Kifisias 1-3, Athens 11523, complaints@dpa.gr).

Technical and Organisational Measures

The Company and its processors implement appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, access or any other unlawful processing. Confidentiality obligations apply contractually to all processors and authorised personnel. Personal data will not be used for purposes other than those described in this Policy without prior information and, where required, consent.