PRIVACY NOTICE

(In Accordance with the General Data Protection Regulation 2016/679/EU)

The company under the name **«ICON FITNESS S.A. Gym Operation»**, located in Halandri, Athens at Ethnikis Antistaseos Street, 43, with Tax ID 800760680, Tax Office: Athens Tax Office (GEMI: 139939801000), as legally represented (hereinafter referred to as «ICON FITNESS»), under the capacity of **"Company" or/and "Data Controller"**, provides to the Data Subjects the hereby information on the collection, processing and protection of Personal Data (hereinafter «Information») concerning them, as defined in Article 13 and 14 of the General Data Protection Regulation 679/2016 (EU) (hereinafter «GDPR»).

DEFINITIONS

For the purposes set herein, the following concepts shall have the following meaning:

"Personal data": for the purposes of this Information, any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is the one whose identity can be ascertained, directly or indirectly, in particular by reference to an identifier such as a name, an identity number, location data, an online identifier (e.g. IP address) or one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

«Data Subject»: any natural person who decides to make use of the Company's fitness and wellness services either as a Member or for a trial period, or visits the Company's premises to obtain personalized information on services of interest to him/her, without making use of them.

"Special categories of personal data": personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union Data Subjectship, and the processing of genetic data, biometric data aiming for an indisputable identification of a person, data concerning health or data relating to the sexual life or sexual orientation of a natural person.

"Processing": any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as the collection, registration, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise disposal, alignment or combination, restriction, erasure or destruction.

"Controller": the natural or legal person, public authority, agency or any 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 processing are determined by EU or Data Subject State laws, the controller or the specific criteria for appointing the controller may be designated by those laws.

"Consent": any freely given, specific, unambiguous and informed indication of will by which the data subject, either 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": the 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.

"Agreement for the provision of services": means the registration and subscription to Company's fitness and wellness services, including purchases of individual services.

CATEGORIES OF PERSONAL DATA WE PROCESS

The Company informs the Data Subjects that, in accordance with the provisions of applicable European and national legislation, in particular the GDPR 2016/679 (EU) and Law 4624/2019 acting as Data Controller, may collect and process only those personal data that are necessary for the specific and clearly defined purpose and the specific legal basis, such as:

• **Demographic Identification Data:** name, surname, date of birth, identification document (e.g. national ID or passport), and Tax Identification Number
• **Contact Data:** email address, mailing address, phone numbers, etc,
• **Special Categories of Personal Data or Sensitive Personal Data:** It is legally required health data, such as medical certificates and reports for the safe participation of the subject in the activities provided by Company as per applicable legislation.
• **Payment data:** these are confirmations of the completion of transactions through cooperating banking and financial institutions, in the context of the fulfilment of the Agreement, if necessary. The Company keeps the permitted cardholder data, such as the last digits of the bank account number and expiry date of credit/debit cards.
• **Personal preferences and interests:** As regard specific benefits in addition to the above personal data, Company may collect and process information about the personal preferences and interests of the Member, according to his/her own statements, in order to offer him/her personalized services.
• **Answers to surveys and questionnaires:** This is information or/and comments provided by a Member upon its statement to Company, through answers to surveys and questionnaires, as part of an evaluation of the provided services by the Member or/and his/ her own self-assessment.
• **Security cameras data:** Company applies a video surveillance system using cameras solely for the safety of its establishments, its staff, Data Subjects, as well as their goods.
• **Personal data of minors:** Company may collect and process only the necessary personal data relating to minors for the purpose of providing fitness and wellness services, subject to the prior consent or written authorization of the minor's parent or guardian. For further information on minors, please refer to the Terms and Conditions of your registration. However, parents and guardians of minors are recommended to contact Company immediately if they become aware of any unauthorized disclosure of data by minors for whom they are responsible in order to exercise their rights accordingly, such as to have their data deleted.

PURPOSES FOR THE PROCESSING OF PERSONAL DATA

The Company may collect the personal data of the Data Subject which are necessary for the fulfillment of the following purposes, based on the respective legal bases:

PURPOSES OF PROCESSING	LEGAL BASIS
Registration to our services, as provided each time (e.g. Individual Training, Group Programs etc.).	Processing is necessary for the performance of the Agreement
Subscription to the member list	Processing is necessary for the performance of the Agreement
Registration to the competitions	Processing is necessary for the fulfillment of Company's legitimate interests
Subscription management (including communication on issues subscription or account user account)	Processing is necessary for the performance of the Agreement
Issuance, collection and storage of financial data and tax documents	Processing is necessary for Company's compliance with legal obligations

Claiming outstanding debts and resolving out-of court or legal disputes with Members	Processing is necessary for Company's compliance with legal obligations and in case of special categories of data processing, data processing is necessary for the establishment, exercise or defense of Company's legal claims
Protection of the premises and of persons on the premises	The processing is necessary for the fulfilment of the company's legitimate interests

Also, if required and upon prior express, free and informed consent of the Data Subject for specific processing purposes, the Data Subject's data may be used by Company for the achievement of these specific purposes, such as, but not limited to,
- sending personalized information about new products and services,
- sending regular updates that the Company deems of interest to the User,
- sending information on request about products and services,
- to carry out market research and marketing purposes,
- to serve internal purposes of the Company's management and to improve the services provided
- direct marketing purposes, to provide information of the company resulting from the commercial relationship, to inform about events and parties of the Company, as well as to register for individual (or not) training programs.

In case you do not wish to receive such information, you may exercise your rights as described below in the section «DATA SUBJECT RIGHTS».

COLLECTION OF PERSONAL PREFERENCES AND INTERESTS THROUGH THE ICON WEBSITE FITNESS

In addition to the collection of data by the aforementioned means, when expressly authorized, the Company uses technology that allows the collection of information about the users of the icon fitness.gr website. For example, the website server automatically collects information about which pages you visited, as well as which browser you used.
Our website includes hyperlinks to other pages on the website. The technology may also be used to track the frequency with which you visit other pages.
These links are used and which pages are the most viewed. When provided by the User of the ICON FITNESS website, this information may be used for direct marketing purposes.

ACCESS TO AND TRANSMISSION OF PERSONAL DATA

Personal data voluntarily provided by the Data Subject to Company is available to its Personnel directly or indirectly related to the management or/and provision of services selected by the Subject of the Data. In addition, when the Data Subject has given his/her consent to receive direct marketing updates (marketing), then the absolutely necessary personal data for this purpose are transmitted to the Promotion and Commercial Management Department of Company. Where the data subject has given his or her consent, the personal data may be shared with other companies in the group or such data may be transferred to other companies that may contact him or her about products or services that may be of interest to him or her. If you are located in a country other than where the Company's servers are located, communications may involve the transfer of information across borders.
Certain transmissions of the health data relating to the results of medical examinations, doctors' reports, are expressly excluded, except where explicit written consent of the data subject has been given for that particular purpose and it accompanies the corresponding transfer to a third party or the processing of such data is necessary in the context of establishing or claiming legal claims of Company.

MAINTENANCE TIME

Company retains and processes the above personal data for no longer than is necessary for the long as it is required for the realization of the aforementioned purposes of legal processing and for the period required to comply with its legal obligations and to defend itself against any legal claims.

In particular, the Company shall retain the personal data of Data Subjects provided to it through the website for one (1) year from the date of provision. The Company shall retain the Personal Data concerning the Member for a period of two (2) years after the end of the commercial relationship, after which the data shall be destroyed, completing all processing operations on the respective data.
Company shall retain the contact details of the Data Subjects necessary for the purpose of informing and promoting its services and activities until the revocation of the relevant prior consent provided by the Data Subject. Tax data are kept in accordance with the applicable tax legislation.

Furthermore, the Company retains the data recorded by the video surveillance system of its premises and facilities for a specified period of time which has been set at fifteen (15) days, after which the data shall be automatically and permanently deleted without possibility of recovery. In the event that an incident is detected during this period, the Company shall isolate part of the video and keep it for up to one (1) more month, in order to investigate the incident and initiate legal proceedings to defend its legal interests.
After the expiration of the aforementioned periods, the personal data will be securely deleted.

TECHNICAL AND ORGANIZATIONAL MEASURES

Company undertakes to comply with its Personal Data Protection Policy, as applicable, and to implement clear and rigorous procedures and policies to protect them. The Company also undertakes to adopt and implement appropriate technical and organizational measures to safeguard the interests of the Data Subject in order to ensure a level of protection corresponding to the risks entailed in the processing, as well as to maintain confidentiality, integrity, availability and security of its systems or any third parties involved in the processing.
For this purpose, the Company processes the personal data of the Data Subjects in a manner that guarantees their accuracy, continuous updating and security, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage, taking all technical and legal measures to ensure the security of the data. Any organisational measures deemed appropriate for this purpose, in particular by means of encryption, coding, pseudonymisation and anonymisation of the data personal data, as well as by controlling, monitoring and regularly recording all processing operations.

RIGHTS OF DATA SUBJECTS

The Data Subject may at any time exercise his/her rights to process his/her personal data, as defined by the GDPR. In particular, the data subject shall be entitled to:

1. Request access to his/her personal data. He/she may request to receive a copy of the personal data maintained by Company and check the lawfulness of such processing.
2. Ask for the correction of his/her personal data. He/she may request verification of the accuracy of the data being held and, if the data is found incomplete or inaccurate, he/she may produce the correct data.
3. Ask for the deletion of his/her personal data. He/she may request the deletion of his/her personal data, provided that the data is not kept on a lawful basis or for any legitimate interest.
4. Request a limitation on the processing of his/her personal data.
5. Request portability/transmission of personal data in a structured, commonly used and machine readable form. Enforcement of this right is only possible in automated processing.
6. Withdraw his/her consent at any time regarding the processing of his/her personal data, where applicable. However, this shall not affect the lawfulness of any processing performed prior to the withdrawal of the Data Subject's consent.

In the event that one or more of the above rights are exercised by the Data Subject, Company shall take all possible steps to satisfy the Data Subject's request within a reasonable time but no later than one (1) month from the date of the submission of the request and its identification. This deadline can be extended by two (2) more months, if necessary, if the request is complex or there is a large number of requests. In this case, Company is obliged, within one month of identifying the request, to inform the Data Subject of the delay and the reasons for such delay. Within that time, Company shall also inform the Data Subject about any refusal to comply with the request in whole or in part, as well as the reasons for such refusal.

CONTROLLER

ICON FITNESS is the data controller with the following contact details:

Address: 43, Ethnikis Antistaseos, Chalandri
Email: Dataprotection_GR@iconfitness.gr

In order to exercise the above rights, the Data Subject may contact the Company's Contact Person responsible for Personal Data Protection using the following E-mail address: Dataprotection_GR@iconfitness.gr or on **210 6710250.**

In addition, if the Data Subject considers that any right or legal obligation of our Company regarding the protection of Personal Data
is violated, he/she may contact the competent supervisory authority, namely the Hellenic Data Protection
Authority (www. dpa.gr).

For further information about the protection and security of personal data, please visit the Privacy Center on our website (https://iconfitness.gr/privacy-center/).