



PRIVACY NOTICE

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

The company under the name HOLMES PLACE EAST MED BV (formerly under the name "HEALTH & FITNESS EAST MEDBV"), established under the laws of the Netherlands, headquartered in the city of Amsterdam (Leidsegracht 38-40, 1016 CM), and legally owning a branch in Greece according to the provisions of Art. 58 of L. 3190/1955, VAT No 999868803, Tax Office FAE of Athens, headquartered in Marousi Attica, at 40 Agiou Konstantinou st., tel. 2107475600, as legally represented, hereinafter referred to as "**Holmes Place**" or/and "**Data Controller**", provides you the hereby information on the collection, processing and protection of Personal Data (hereinafter «Information») concerning you, as defined in Article 13 of the General Data Protection Regulation 679/2016 (EU) (hereinafter «GDPR»). This Notice applies both to data subjects who make a trial use of Holmes Place's services or receive personalized information about the services provided to them, and to those who wish to use our services in the capacity of Data Subject.

DEFINITIONS

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

"Personal data": 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 contract with Holmes Place for the provision of fitness and wellness services and rehabilitation and any natural person who makes a trial use of the fitness and wellness services or simply visits the company's premises to obtain personalised information about 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.

"Health data": personal data of special category relating to the physical or mental health of a natural person, including the provision of healthcare services, which reveal information about his/her health status.

"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.

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

"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.

"Main Contract": means the registration and subscription to Holmes Place's fitness and wellness services, including purchases of individual services.

"Trial period of use": provision of free access and use of the company's facilities for up to thirty (30) days.

CATEGORIES OF PERSONAL DATA WE PROCESS

Holmes Place informs you 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, Holmes Place 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 (TIN), as well as relevant business data, if required.

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 Holmes Place as per applicable legislation. This category includes, where appropriate, the necessary health data voluntarily provided by the subject for the provision of spa services, as well as data on the dietary habits or any allergies of the subject, if the data subject chooses the corresponding services. Similarly, at Holmes Place, we keep and process those health and biometric data that are necessary to fulfil the purposes of providing personalised fitness services, such as results of ergonomic tests and footprint examinations.

Payment data: these are confirmations of the completion of transactions through cooperating banking and financial institutions, in the context of the fulfilment of the Main Agreement, if necessary. Holmes Place does not keep debit/credit card and bank account information.

Personal preferences and interests: As regards specific benefits in addition to the above personal data, Holmes Place may collect and process information about the personal preferences and interests of the Data Subject, 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 Data Subject upon its statement to Holmes Place, through answers to surveys and questionnaires, as part of an evaluation of the provided services by the Data Subject or/and his/ her own self-assessment.

Photos: These are Data Subjectship photos which are provided by the Data Subject and are maintained by Holmes Place in the CRM for identification and.

Security cameras data: Holmes Place applies a video surveillance system using cameras solely for the safety of its establishments, its staff, Data Subjects and visitors, as well as their goods.

MINORS' PERSONAL DATA

Holmes Place 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 authorisation 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 Holmes Place 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

Holmes Place 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 BASES
Data Subjectship	Processing is necessary for the performing of the Contract
Registration of Visitors	Processing is necessary in order to take measures at the request of the data subject in the context of a possible procurement procedure
Provision of fitness and wellness services to Data Subjects and visitors	Processing is necessary for the performance of the service contract
Data Subjectship management (including communication on subscription or user account issues)	Processing is necessary for the fulfillment of Holmes Place's legitimate interests
Issuance, collection and storage of financial data and tax documents	Processing is necessary for Holmes Place's compliance with legal obligations
Evaluation of our services by the Data Subjects	Processing is necessary for the fulfillment of Holmes Place's legitimate interests
Claiming outstanding debts and resolving out-of court or legal disputes with Data Subjects	Processing is necessary for Holmes Place's compliance with legal obligations and in case of special categories of data (sensitive data) processing is necessary for the establishment, exercise or defense of Holmes Place's legal claims
Protection of the premises of the premises and of persons on the premises	The processing is necessary for the fulfillment 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 Holmes Place for the achievement of these specific purposes, such as, but not limited to, direct marketing campaigns and disclosure of information with regard to international or other events, organized and provided by Holmes Place or any company belonging to the Holmes Place group of companies (Holmes Place Europe BV), as well as to inform about, manage and provide services related as well as for the information, management and provision of services related to the services requested by the data subject, either at the stage of the trial period, or at the stage of receiving personalized information, or with the scope of the Main Contract, in accordance with the choices and interests of the Data Subject (e.g. Individual Training, Group Programs, Wellness & Beauty, etc.).

Holmes Place collects and processes only the strictly necessary special categories of personal data for the purpose of providing coaching services only with your prior express, free, informed, and unambiguous consent.



ACCESS TO AND TRANSMISSION OF PERSONAL DATA

Personal data voluntarily provided by the data subject to Holmes Place 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 use of direct marketing campaigns is explicitly permitted by the relevant Data Subjectship agreement or a subject of the data's specific consent, then the absolutely necessary personal data for this purpose are transmitted to the Promotion and Commercial Management Department of Holmes Place.

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 Holmes Place.

MAINTENANCE TIME

Holmes Place keeps and processes the above personal data for the period required for the realization of the aforementioned purposes of lawful processing in the context of the exercise of its duties and for the period of time required to comply with its legal obligations and to defend itself against any legal claims.

In particular, for data subjects who make a trial use of our services, Holmes Place shall keep the personal data you provide to us for at least as long as you make use of the services you have chosen, plus (1) year after the end of this period, unless otherwise specified in a specific case by Holmes Place or otherwise required by law on a case-by-case basis. The same retention period applies if you visit the club for personalized information about services provided that interest you, even if you do not use them. The processing of your personal data for promotional purposes is possible until your prior consent is withdrawn.

TECHNICAL AND ORGANIZATIONAL MEASURES

Holmes Place undertakes to comply with its Personal Data Protection Policy, as applicable, and to implement clear and rigorous procedures and policies to protect them. It also undertakes to adopt and implement appropriate technical and organizational measures throughout the term of the Main Contract 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.

RIGHTS OF DATA SUBJECTS

The data subject (ed.n. Data Subject) may at any time exercise his/her rights to process his/her personal data, as defined by the GDPR EU (2016/679). 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 Holmes Place 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. For convenience, the registered Data Subject may enter his online account on the Holmes Place website and partially update his or her details, such as telephone number, email address and postal address.
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. In this context, the Data Subject may manage his consents through the corresponding field on his online account on the Holmes Place website. In the event that consent is withdrawn as regards data, the processing of which is strictly necessary for the provision of Holmes Place's services, then it shall have the right to stop providing any service to the Data Subject, in whole or in part. 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, Holmes Place 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, Holmes Place 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, Holmes Place 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.

In order to exercise the above rights, the data subject may contact the Holmes Place's Contact Person responsible for Personal Data Protection using the following E-mail address: **Dataprotection_GR@holmesplace.gr** or on **210.7475600**.

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://www.holmesplace.gr/en/privacy-center>).

Based on the Privacy Notice, you declare that you have read and understood its content and provide your consent as below to the processing of your Personal Data, for the processing purposes stated in the Privacy Notice and based on your explicit consent. In particular, you declare that:

☐ consent to receive a regular newsletter about Holmes Place activities and services to my email address. I was informed that I can revoke my consent at any time for the above purpose, by contacting directly at E-mail: **Dataprotection_GR@holmesplace.gr** or at tel. **210.7475600**.

☐ consent to receive from Holmes Place informational and promotional messages about its activities in the communication media, which I have indicated. I was informed that I can revoke my consent at any time for the above purpose, by contacting directly at E-mail: **Dataprotection_GR@holmesplace.gr** or at tel. **210.7475600**.

☐ consent to the collection, processing and storage of my personal health, nutrition and biometric data, for the provision of personalized information and personalized fitness, nutrition and spa services, in the context of the use of Holmes Place services, reserving the right to withdraw my consent by contacting directly at E-mail: **Dataprotection_GR@holmesplace.gr** or at tel. **210.7475600**.