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PRIVACY POLICY

We are LEXICON, a company incorporated under Greek law with registered offices at Thessaloniki. In order to provide you with accurate and efficient translation services (hereinafter referred to as the “Services”), we need to collect and process certain Personal Data.

At LEXICON we understand the importance of protecting your Personal Data and are committed to maintaining the highest standards of privacy and confidentiality. Therefore, we make sure that we stay always in line with Regulation (EU) 2016/679 (General Data Protection Regulation or GDPR), Law 4624/2019 and all other relevant provisions of Greek and European legislation on the protection of Personal Data.

NOTWITHSTANDING TO ANYTHING AFOREMENTIONED OR SPECIFIED HEREINBELOW THE GDPR WILL APPLY ONLY IN THOSE CASES WHEN YOU ARE A CITIZEN OR RESIDENT OF ONE OF THE MEMBER STATES OF THE EUROPEAN UNION.

We have set forth this Privacy Policy to explain how we, LEXICON collect, use, process, and safeguard your information and Personal Data when you use our Services, interact with our website, or communicate with us. Our Privacy Policy is designed to be transparent and give you a comprehensive understanding of the steps that we take to protect the information and Personal Data that you share with us, and we would always recommend that you read it in full.

Please note that this Privacy Policy applies to your use of our Services, and it governs any and all data collection and usage by us. It does not govern the collection and use of information and Personal Data by companies that we do not control, nor by individuals not employed or managed by us. Social Media and Networking Platforms have their own privacy policies, and you should also read the applicable privacy policy for the social media or networking platform that you are using to see how it collects and use your Personal Data.

By using our Services and providing us with your Personal Data, you acknowledge that you agree to this Privacy Policy. Where consent is required for specific processing activities, you confirm that you have given us said consent.

We reserve the right to update or modify this Privacy Policy at any given time without prior notice by posting the revised version of this Privacy Policy on our website. If you want to make sure that you are up to date with the latest changes, we advise you to frequently visit this page. Your use of our Services following any such change, constitutes your agreement that all Personal Data and information collected from or about you after the revised Privacy Policy is posted on the website will be subject to the terms of the revised Privacy Policy.



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You may access the current version of this Privacy Policy at any time by clicking on the link marked Privacy Policy at the bottom of the homepage of our website.

1. Personal Data Controller

LEXICON TRANSLATIONS E.E. (an incorporation pursuant to the laws of Greece, located at Thessaloniki - referred to as “**LEXICON**”, “**company**”, “**we**”, “**us**” and “**our**” in this Privacy Policy) is the Data Controller and is responsible for the collection and processing of your Personal Data and information.

2. How we collect your Personal Data

The Company may collect your Personal Data in the following ways **including but not limited to**:

- Using our Services,
- Contacting our Company by e-mail, telephone or mail,
- Cookies stored on your computer or mobile device when you visit the Website

3. Personal Data and other information we collect

This Privacy Policy covers our use of any information that can be considered as “**Personal Data**”. “**Personal data**” means any information relating to an identified or identifiable natural person (“**data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. It does not cover information which cannot be used to identify you (“**Anonymous Data**”).

We collect only the necessary, appropriate and relevant Personal Data in view of the purpose of their processing as well as in order to provide adequately and effectively our Services. The type and amount of Personal Data we collect depends on the status of the data subject (simple visitor of our Website or customer) and the relationship or transaction with it. In view of this the data we collect and process include, without limitation, the following:

(i) Personal Data You Give Us. In providing translation services, we may collect Personal Data and other information contained within the documents, texts, and materials you submit to us for translation. This may include, but is not limited to:

- names,
- addresses,
- contact details (email address, phone number etc)

as well as any other Personal Data or sensitive information present in the source documents.



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If an invoice has been issued, the following are also required: tax office, VAT number, professional activity, name.

Special Category Data/Sensitive Personal Data. The documents, texts, and materials you provide for translation to our Company may contain Special Category Data or Sensitive Personal Data. This type of data may include, but is not limited to, information concerning racial or ethnic origin, ideology or political, religious or philosophical beliefs, information about physical or mental health, biometric or genetic characteristics, sexual orientation, membership of a trade union organization, or information about criminal convictions. The processing of such data is necessary for the provision of our translation services, as the content of the documents you provide dictates what information we must process to provide an accurate translation. We will process any special category data or sensitive Personal Data contained within your documents in accordance with GDPR and other applicable laws, and with appropriate safeguards to protect its confidentiality and integrity.

(ii) Data We Collect Through Your Web Browser. As you interact with our Website, we may automatically collect general data and information that is sent to us by your web browser such as:

- details of the device(s) you use to access our Website,
- your internet protocol (IP) address,
- your browser type and version,
- time zone setting and location,
- information on your operating system and browser and
- the date and time you visited our website.

We collect these data by using cookies and other similar technologies, depending on the settings on your web browser. The data we collect automatically do not include information that identifies you personally.

Please see our **Cookie Policy** for more information about how we use them. Insofar as cookies collect Personal Data, we will process it only based on your explicit consent, in anonymized form, or under a pseudonym.

(iii) Data Provided to Us by Third Parties. We may receive data about you from our business partners, service providers or services (such as LinkedIn) you may interact with. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you. We use the Personal Data and information provided to us by these third parties consistent with Regulation (EU) 2016/679 (General Data Protection Regulation or GDPR), Law 4624/2019 and all other relevant provisions of Greek and European legislation on the protection of Personal Data. However, we do not control how these third parties themselves use or disclose the information they collected from or about



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you, nor is any such third party's use or disclosure of such information subject to this Privacy Policy.

4. How we collect your Data

We may collect Personal Data and other information from and about you in the following ways:

- when you interact directly with us,
- when you use our Services,
- when you interact with our website,

5. For what purpose do we collect your Personal Data

To conclude your contract with our Company or to protect our legal interests, we collect and process your Personal Data for the following purposes:

A. to provide you our Services. We use your Personal Data and information we collect to enhance and provide you with our Services.

B. to improve and develop our Services. We use your Personal Data and information we collect to understand and improve our Services. For example, in order to:

- monitor and analyze the effectiveness of our Services,
- identify and address issues on our Services,
- refer back to past records to facilitate any future collaboration
- improve and develop our Services.

C. to communicate with you. We process your Personal Data to respond to your requests and questions, to manage problems that may arise with regard to our Services, as well as to make it easier for you to exercise your rights or your claims.

D. to hire you at our Company. We may use your Personal Data during the process of employing you at our Company, whether for current or future opportunities. This includes assessing your qualifications, skills, and experience; conducting background checks where permitted by law; communicating with you about the application process; and fulfilling any legal or regulatory requirements related to employment.

E. to commence an external partnership with you. This includes evaluating your suitability and qualifications for potential collaboration, assessing your company's or your professional background and expertise, communicating with you about partnership opportunities, proposals, and agreements, conducting due diligence checks, where necessary and legally permissible, managing the administrative and contractual aspects of the partnership, maintaining records of our interactions and agreements for future reference and collaboration.



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F. to keep you updated about our Company's news and Services. This involves using your contact information to send you updates about our latest service offerings, special promotions, and industry news, inform you about changes or improvements to our Services that may be relevant to you, share company news, events, or publications that may be of interest, provide you with information related to your specific inquiries or interests in our Services, communicate information that we believe will enhance your experience with our company.

G. for purposes of compliance. We process your Personal Data to comply with the obligations that are imposed by the applicable legal, regulatory framework, as well as the decisions of authorities (public, supervisory, independent, prosecutorial, etc.) or courts (ordinary or arbitral).

H. to protect the legitimate interests of the Company or third parties. That purpose includes processing for reasons such as establishing, exercising and supporting the Company's legal claims; for purposes of fraud prevention, security, protection of rights, information systems, property of the Company, its employees and users of the Website in general; compliance of the Company with its obligations arising out of contracts with third parties.

6. What is the lawful basis for processing your Personal Data

We will only collect and process your Personal Data and information where we have a lawful basis to do so. As Data Controller, the lawful basis for our collection and processing of your Personal Data varies depending on the manner and purpose for which we collect it. Therefore:

- for the purposes described under Section 5.A. we process your Personal Data and information only if and to the extent that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract (Art. 6 par. 1 b GDPR)
- for the purposes described under Sections 5.B, 5.C, 5.D, 5.E, 5.F and 5.H we process your Personal Data and information only if and to the extent that we have a legitimate interest, except where such interest is overridden by your interests or fundamental rights and freedoms which require protection of Personal Data (Art. 6 par. 1 f GDPR)
- for the purposes described under Section 5.G. the lawful basis for processing your Personal Data is the compliance with a legal obligation of the Company. The provision of the Personal Data and processing is mandatory, since the inability of the Company to provide said Personal Data would constitute a violation of its legal obligation. (Art. 6 par. 1 c GDPR)

Consent. In addition to the abovementioned legal bases and for any other purpose not included in the purposes described under Section 5 or in case of processing of special categories of data, we will ask for your consent (Art. 6 par. 1 a GDPR) to process your Personal



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Data and information. The consent will contain information on that specific processing activity. In this case the lawful basis for the processing by us of your Personal Data and information is the consent you provided. If you have given consent to a processing of your Personal Data and information you can always withdraw the consent as described in Section 10 g.

We will only use your Personal Data and information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose or the processing undertaken is otherwise permitted by law. In case we use your Personal Data for an unrelated purpose, we will notify you promptly and we will explain the lawful basis which allows us to do so.

7. Information on new or related services (Newsletter)

The Company may use your contact details (in particular your email address) to send you informational messages and newsletters concerning services that are similar or related to those you have already received from us, as well as to inform you about new services, initiatives or offers. This processing takes place within the framework of an existing or previous customer relationship and is based on the Company's legitimate interest in promoting its services and maintaining its professional relationship with its customers, in accordance with Article 6(1)(f) of the General Data Protection Regulation (GDPR).

You have the right, at any time, to object to the processing of your personal data for the purposes of direct marketing, including the receipt of newsletters. You may exercise this right by clicking on the unsubscribe link included in every such email or by contacting us using the contact details set out in this Privacy Policy. In case of objection or unsubscribe, the Company will immediately cease using your contact details for this purpose and will add you to a dedicated suppression list, in order to ensure that you do not receive similar messages in the future.

The contact details used for the sending of newsletters and other informational communications are kept for as long as your customer relationship with the Company exists and, after its termination, for a period that is considered reasonable in light of the nature of the relationship and the applicable limitation periods, unless you exercise your right to object or unsubscribe earlier. If you exercise this right, your contact details will no longer be used for newsletter purposes and will be retained only to the extent necessary to ensure that you do not receive similar communications in the future and/or for the fulfilment of any other legal obligations of the Company.

8. Who we may disclose your Personal Data and information to



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For the fulfillment of the above processing purposes, the Company may disclose or transmit your Personal Data to third parties service providers who, in cooperation with the Company, assist in the proper operation of this Website, such as, but not limited to, technology service providers for the protection and security of our electronic systems.

Third parties to whom your Personal Data may also be transferred include, without limitation, our employees, associates and other subcontractors, financial institutions, lawyers, law firms, insurance companies, public authorities, Legal Entities governed both by Public and Private Law, judicial authorities, regulatory bodies and organizations, regardless of jurisdiction or rank, if required by Law, Court Decision, Regulation, Directive, order, opinion, circular etc., our special or universal successors, in case of sale, disposal, merger, liquidation of our business.

The Company remains responsible for the processing of your Personal Data and defines the individual elements of the processing. The Company signs a contract with the third parties entrusted with the execution of processing activities, in order to ensure that the processing is carried out in accordance with the applicable legal framework and that each natural person may freely and unhindered exercise the rights provided by the applicable legal framework.

For the effectiveness of our services, some of the above providers may be located in countries outside of the European Economic Area. These countries may not provide a level of data protection equivalent to that of the European Union. If we transfer your Personal Data to such countries, we ensure you that there are adequate guarantees and we maintain at all times the security of your Personal Data, using appropriate international data transfer tools, such as Standard Contractual Clauses. You can view the content of these Standard Contractual Clauses in the following link: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en

9. How long do we keep your Personal Data

We, and anyone that we share your Personal Data and information with, keep your Personal Data and information that identifies you for as long as we need to provide the Services to you and fulfil the purposes set out in this Privacy Policy, unless retention of the data for a longer period is justified in order to comply with law or recordkeeping obligations, to respond to a legal request, prevent harm, or to improve our safety, integrity and security features. This is a case-by-case determination that depends on things like the nature of the data, why it is collected and processed, and relevant legal or operational retention needs.

When we no longer need to use your Personal Data and information and there is no need for us to keep it to comply with our legal or regulatory obligations, we will either remove it from our systems or anonymize it so that it can no longer be associated with you. When removing



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Personal Data and information, we will take commercially reasonable and technically feasible measures to make said Personal Data and information irrecoverable or irreproducible.

10. How we ensure the protection of your Personal Data

Our highest priority is to process your Personal Data with safety. That's why we take appropriate technical and organizational measures to ensure its safe keeping, the confidentiality of its processing from accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access and any other form of unlawful processing. In this context, we update and monitor the security technology we use on an ongoing basis, restrict access to your Personal Data to employees who need to be in knowledge of this data in order to provide our services to you and educate our employees on the importance of the confidentiality and keeping the privacy and security of your Personal Data. Indicatively, among others, we have implemented the following technical and organizational measures and procedures to protect your Personal Data from any loss, alteration, unlawful processing or modification:

- a. encryption
- b. detection and management of security incidents
- c. use of servers located in rooms with limited access and subject to regular checks
- d. the use of computer information systems and computer programs installed in a way that minimizes the use of Personal or/and Authentication Data of the user
- e. adopting individual procedures for the retention of Personal Data and its secure deletion/destruction

However, please be aware that no security measures are perfect or impenetrable. Since the Internet is not a completely secure environment and is accessible by everyone we cannot guarantee the security of your Personal Data and information, and there is some risk that an unauthorized third party may find a way to circumvent our security systems or that transmission of your information over the Internet will be intercepted. In the unlikely event that we identify a leak or data breach, we will take all measures necessary to inform you and the relevant authorities. If you identify a leak of your data, you must contact us immediately, within 24 hours of becoming aware of it.

11. What are your rights in relation to your Personal Data

Every natural person whose Personal Data is processed by our Company has the following rights:



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a. Right of access: You have the right at any time to access directly your Personal Data and verify the period and method of storage, as well as to be informed on the way we process and the methods we use to protect your Personal Data.

b. Right of correction: If your Personal Data and information are incorrect or incomplete, you are entitled to have your Personal Data and information rectified, modified or updated.

c. Right to erasure: You have the right request erasure of your Personal Data and information in case: you withdraw your consent to the processing and there is no other legitimate reason for processing; you object to the processing and there is no justified reason for continuing the processing; or processing is unlawful.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

d. Right of restriction of processing: You have the right to request restriction of the processing of your Personal Data in the following cases: (a) when you question the accuracy of your Personal Data until it's verified, (b) when you do not want to have your Personal Data deleted and request restriction instead of deletion, (c) when your Personal Data are not used for processing purposes, they are however necessary for the establishment, exercise and support of legal claims, and (d) when you object to the processing, if we have legal reasons that supersede your reasons to object our processing of your Personal Data. In these cases we can retain your information but cannot process it further, and only hold any data needed for future reference.

e. Right of objection to processing: You have the right to object the processing of your Personal Data if, as described above, this is necessary for the protection of the legitimate interests that we pursue as controllers, as well as if the processing takes place for direct marketing and profiling purposes.

f. Right to portability: You have the right to receive, free of charge, a copy of the "customer card" containing your Personal Data in electronic or paper format, allowing you to access, verify and process them by commonly used processing methods. You also have the right to request, if technically possible, to transfer your data directly to another controller. This right can be exercised for Personal Data that you have provided to us with your prior consent or in performance of a relevant contract and is processed automatically.

g. Right to withdraw consent: Finally, the Company informs you that if the processing of your Personal Data is carried out based on your prior consent, you have the right to freely withdraw said consent at any time by submitting a request to that effect by email to: services@lexicon.com.gr . Your exercise of said right to withdraw shall not affect the lawfulness of the processing that took place based on your consent prior to its withdrawal.



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h. Right to lodge a complaint to the DPAA: You have the right to lodge a complaint to the Data Protection Authority (1-3 Kifissia Street, P.C. 115 23, Athens) if you believe that an infringement of your rights has taken place. For more information on the Authority's competence and the way to lodge a complaint, you can visit the Website (www.dpa.gr). Phone Center: (+30) 210 6475600, Fax: (+30) 210 6475628, E-mail: contact@dpa.gr

Please note the following relating to the above rights:

- i. Your rights under c, d and e may not be satisfied, in whole or in part, if they concern Personal Data necessary for the establishment or/and performance of a contract.
- ii. The Company reserves the right to refuse your request for restriction of processing or deletion of your Personal Data if the processing or retention of the data is necessary for the establishment, exercise or support of its legal rights or the fulfillment of its legal obligations.
- iii. The exercise of the above rights is valid for all future processing and does not affect the processing that has been already carried out.

12. How to exercise your rights

To exercise the above rights, you can contact our Company by email at services@lexicon.com.gr. You may also use the above-mentioned contact details to address any questions you have about this Privacy Policy.

With regard to your right to withdraw your consent, please be aware that you can exercise your right as described above. Upon analyzing said request and identifying the person requesting said withdrawal, the Company shall proceed to satisfy your request within a month, provided that the request is legitimate and valid.

However, please note that if you decide not to provide us with the Personal Data and information that we request, we may not be able to provide our Services to you.

13. Release notes – Amendments

This Privacy Policy was last updated on **21/07/2026**. The Controller reserves the right to unilaterally modify and update the Privacy Policy in whole or in part at his sole discretion at any time and for any reason without prior notice, except for posting it on the Website. Users should check the Website frequently so as to be informed on the applicable Privacy Policy before providing their Personal Data and during its processing.



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