



PRIVACY POLICY

European Company Sport Games

ECSG ATHENS 2027

The protection of your personal data and respect for your privacy are of great importance to us.

This Privacy Policy explains how the **Hellenic Organization for Company Sport and Health ("HOCSH", "we", "us", "Organiser")**, as the organiser of the **European Company Sport Games Athens 2027** (the "**Event**"), collects, uses, stores, discloses and otherwise processes personal data in connection with the organisation and operation of the Event.

The Event will take place in **Athens, Greece, from 16 to 20 June 2027**.

The processing of personal data is carried out in accordance with the **Regulation (EU) 2016/679 ("GDPR")**, Greek Law 4624/2019, as applicable, and all other applicable European and national data protection legislation. Please read this Privacy Policy carefully.

1. WHO WE ARE

1.1. The data controller for the processing activities described in this Privacy Policy is:

HELLENIC ORGANIZATION FOR COMPANY SPORT AND HEALTH (HOCSH)

166A Kifisias Avenue & Sofokleous Street

15126 Maroussi, Athens, Greece

Tel.: +30 212 0002527

E-mail: welcome@hocsh.org

Website: <https://www.hocsh.org>

1.2. For certain processing activities, other entities involved in the Event may act as independent data controllers, joint controllers or processors, depending on the nature and purpose of the relevant processing. Where applicable, this will be communicated to you through the relevant registration forms, participation terms, accreditation documentation or other appropriate privacy notices. In particular, the European Federation for Company Sport (EFCS) and participating national or company-sport

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organisations may process personal data in connection with their respective responsibilities for the Event. Their respective roles will depend on the specific processing activity concerned.

2. WHAT IS PERSONAL DATA?

According to the aforementioned legislation, the following terms shall have the meanings set out below:

Personal Data (hereinafter referred to as “**Personal Data**”): Any information relating to an identified or identifiable living natural person (the “**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, psychological, economic, cultural, or social identity of that natural person.

Processing of Personal Data: Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure or communication by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.

3. CATEGORIES OF DATA SUBJECTS

The categories of individuals whose Personal Data are processed by the Organiser and to whom this Privacy Policy applies include:

- athletes
- team managers, coaches,
- employees (permanent and contractual),
- accompanying persons,
- job applicants,
- volunteers,
- officials, referees, judges,
- suppliers, service providers and partners
- business executives and sponsors,
- members of the Federation's Board of Directors,
- sports club and institutional representatives,

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- medical and support personnel
- media representatives,
- users of the official Event website and related digital services
- visitors, spectators, and other individuals.

4. CATEGORIES OF PERSONAL DATA WE MAY PROCESS

We will collect only the information necessary for the relevant purpose and, where possible, will avoid retaining copies of identification documents where the relevant information can be obtained by other means. Depending on your relationship with the Event and the services you use, we may process the following categories of Personal Data.

4.1. Identification and contact information

This may include: first and last name, gender, date of birth, nationality, country of residence, postal address, e-mail address, telephone/mobile telephone number, emergency contact details, preferred language, social media, self-reported disability status, proof of disability and other contact information.

4.2. Participant and registration information

For participants and athletes, we may process: sport or sports in which you participate, competition category, registration status, participant number, accreditation information, competition schedule, team and Event information, eligibility information, results, rankings and statistics and information required for the administration of the Event.

4.3. Identification and accreditation data

Where necessary for accreditation, access control, security or other legitimate organisational purposes, we may process: identity document or passport information, identification number or equivalent information, photograph, accreditation category, access rights, accreditation status and information concerning access to designated Event venues.

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4.4. Payment and financial information

Where you make payments directly to HOCSSH or through a registration platform, we may process: billing information, tax code, invoicing details, transaction information, payment status, company details and other information necessary to administer the transaction.

Where payment services are provided by a third-party payment provider, payment card details may be processed directly by that provider in accordance with its own privacy policy. Unless necessary for a specific purpose, HOCSSH will not retain complete payment card numbers or security codes.

4.5. Accommodation and travel information

Where accommodation or transportation services are arranged in connection with the Event, we may process: accommodation bookings, arrival and departure information, travel details, transportation requirements, special logistical requirements and related booking information.

Such information may be shared with relevant hotels, transport providers, travel agencies and other service providers strictly to the extent necessary to provide the requested services.

4.6. Health, medical and accessibility information

Certain information concerning health, medical needs, allergies, disabilities, accessibility requirements or emergency assistance may be necessary or useful for the safe participation of an individual in the Event.

We will process such information only where a valid legal basis and an applicable condition under Article 9 GDPR exists, including, where appropriate, your explicit consent, or where processing is otherwise permitted or required by applicable law. We will seek to limit the collection and use of health-related information to what is strictly necessary for the relevant purpose.

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Where a participant voluntarily provides health or accessibility information to enable appropriate assistance, such information will be accessible only to authorised persons who need it for the relevant purpose.

4.7. Photographs and audiovisual material

During the Event, photographs, video recordings, livestreams and other audiovisual material may be produced. Such material may include participants, athletes, volunteers, officials, spectators and other persons present at Games venues.

The purposes may include: documenting the Event, reporting on competitions and results, promoting the Event, communicating Event-related news, publishing Event highlights, promoting company sport, producing reports and publications, maintaining historical records of the Event and communicating about future HOCOSH or company-sport activities.

Where required by applicable law, we will obtain the appropriate consent or rely on another applicable legal basis for the relevant processing. Where an individual is the principal subject of a photograph or recording intended for promotional use, we will take appropriate measures to ensure that the relevant legal requirements are satisfied.

4.8. Information you provide to us directly

We collect information that you provide to us directly such as when you post questions or comments, respond to surveys or communicate with us.

5. HOW WE COLLECT PERSONAL DATA

5.1. We may collect Personal Data:

- directly from you;
- through your participating company or organisation;
- through a team manager or other authorised representative;
- through registration and accreditation platform(s);
- when you contact us;
- when you participate in the Event activities;

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- through accommodation or transportation providers;
- through our website and online services;
- through applications or digital platforms used for the Event;
- through photographs and audiovisual recordings made during the Event;
- from sponsors, partners and service providers where legally permitted; and
- from publicly available sources, where lawful and necessary.

5.2. Where Personal Data are provided to us by a company, team manager, national federation or other third party, that entity is responsible for ensuring that it has a lawful basis to provide the data to us and that the relevant individuals have received the information required under applicable data protection law. This does not limit or replace HOCOSH's own obligations as data controller.

6. PURPOSES FOR WHICH WE PROCESS PERSONAL DATA

We and our service providers use the Personal Data that we collect for a variety of purposes, including:

- registration and administration of participation in the Event;
- team registration and management;
- Event organization and administration;
- Accreditation and access control;
- sports competitions, results management and statistics;
- accommodation and transportation arrangements;
- Event administration and logistics;
- communication with participants and other stakeholders;
- volunteers and Event personnel;
- Security, safety and access control;
- medical, emergency and accessibility services and arrangements;
- incident(s) management;
- photographs, audiovisual recordings and Event communications;
- invoicing;
- media, social media, press activities and publicity;
- sponsorship and partner activities;
- website and online services;
- newsletters and promotional communications;

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- customer support and enquiries;

In addition:

- To provide you with any services, information or other assistance that you have requested from us.
- To process and improve our services and the way we communicate with you.
- To comply with obligations imposed by the applicable laws and regulatory framework in force from time to time.
- To comply with court decisions and to establish, exercise and/or defend our legal rights and claims.
- To provide you, by any means, with information, offers, advice, newsletters and publications that we believe may be of interest to you, and to inform you about products and services offered by us, companies affiliated with us or belonging to the same group, or third parties, and to promote such products and services, as well as to send you customer satisfaction and product and service evaluation surveys, in all cases only where you have provided your consent, where such consent is required by applicable law.
- To process your Personal Data in a non-personalised manner for statistical purposes.
- For any other purpose that is related and/or ancillary to any of the above purposes, or for any other purposes described in the applicable Privacy Notice or for any other purpose for which you have provided us with your Personal Data.

7. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

7.1. We may disclose Personal Data, where necessary and lawful, to:

- EFCS and relevant company-sport organisations;
- participating companies and organisations;
- sports federations and competition bodies;
- referees and officials;
- event management companies;
- registration and accreditation providers;
- timing providers;
- IT and software providers;
- website and hosting providers;

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- cloud service providers;
- payment service providers;
- hotels and accommodation providers;
- transport providers;
- travel agencies;
- security providers;
- medical and emergency service providers;
- photographers, videographers and media service providers;
- communication and marketing providers;
- sponsors and partners, where appropriate and lawful;
- professional advisers;
- auditors and accountants;
- insurers of the Event, the Participants or any other party in relation to the Event;
- public authorities where legally required;
- courts and administrative authorities; and
- other service providers engaged in connection with the Event.

7.2. Third parties processing Personal Data on our behalf will be contractually required, where applicable, to process such data in accordance with GDPR and applicable legislation and our documented instructions and to implement appropriate confidentiality and security measures.

7.3. We are entitled to disclose your Personal Data to other third parties, authorities, judicial or investigative authorities or persons, to the extent required for a lawful purpose, such as:

- a)** compliance with a request from the Hellenic Data Protection Authority or other Independent Authorities and any competent authorities, or with a court decision or applicable law;
- b)** preventing unlawful use of the websites we operate or violations of our policies;
- c)** protecting ourselves against third-party claims or protecting and defending our lawful rights, as well as the security of our organization, employees and users of our websites;
- d)** contributing to the prevention or investigation of criminal activities, such as fraud or corruption.

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Any access to Personal Data, as described above, shall be limited to the extent necessary in each case to achieve the intended purpose.

7.4. Following your instruction or consent, your Personal Data may be transferred to third parties who, upon your authorization, act in your name and on your behalf.

8. DATA RETENTION

8.1. We retain Personal Data only for as long as necessary to fulfil the purposes for which they were collected, unless a longer retention period is required or permitted by law. Different categories of Personal Data may therefore be retained for different periods.

8.2. When Personal Data are no longer necessary, they will be securely deleted, anonymised or otherwise disposed of in accordance with our data retention procedures.

9. DATA SECURITY

9.1. We implement appropriate technical and organisational measures designed to protect Personal Data against: accidental or unlawful destruction, accidental loss, alteration, unauthorised disclosure, unauthorised access, unlawful processing; and other security risks.

9.2. Depending on the nature of the processing, security measures may include: access controls, authentication mechanisms, encryption, confidentiality obligations, secure storage, backup procedures, logging and monitoring, contractual safeguards with processors, staff awareness and confidentiality requirements and incident response procedures.

9.3. However, no method of transmission or storage can be guaranteed to be completely secure. Nevertheless, we take appropriate measures to reduce the risks associated with the processing of Personal Data.

9.4. In the event of a Personal Data breach, we will assess the incident and take appropriate measures in accordance with the GDPR. Where required by law, we will notify the competent supervisory authority and/or affected individuals within the applicable statutory deadlines.

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10. INTERNATIONAL TRANSFERS

10.1. Because the Event is an international event, certain Personal Data may be accessed or transferred outside Greece and, where applicable, outside the European Economic Area ("EEA").

10.2. Where Personal Data are transferred to a country outside the EEA, we will ensure that the transfer is carried out in accordance with Chapter V GDPR.

Depending on the circumstances, we may rely on:

- an adequacy decision of the European Commission;
- Standard Contractual Clauses adopted by the European Commission;
- other appropriate safeguards recognised under the GDPR; or
- a permitted derogation under Article 49 GDPR, where applicable.

11. THIRD-PARTY WEBSITES AND SERVICES

11.1. The Event website or digital services may contain links to third-party websites, applications or services, including social media.

11.2. If you follow a link to any of these websites or apps, please note that these websites and apps (and any services that may be accessible through them) have their own privacy policies. HOCOSH is not responsible for the privacy practices, content or security of third-party websites or services.

11.3. When you leave the Event website or use a third-party service, we recommend that you review the privacy policy of the relevant provider.

12. SOCIAL MEDIA

12.1. The Event and HOCOSH may maintain official pages or accounts on social media platforms. When you interact with these platforms, your Personal Data may also be processed by the relevant social media provider.

12.2. Those providers operate under their own privacy policies and terms. We recommend reviewing the privacy settings and privacy policies of the relevant platforms.

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13. COOKIES AND SIMILAR TECHNOLOGIES

13.1. The Event website may use cookies and similar technologies. Cookies may be used for purposes including ensuring the technical operation of the website, maintaining security, remembering preferences, analysing website traffic, improving website functionality and measuring the effectiveness of communications and campaigns.

13.2. Where required by law, non-essential cookies will only be placed or used with your consent.

13.3. Further information is provided in our **Cookie Policy**, which explains the categories of cookies used, their purposes and how you can manage your preferences.

14. WEBSITE AND TECHNICAL INFORMATION

14.1. When you visit the Event website, certain technical information may be automatically collected, such as:

- IP address;
- browser type;
- device type;
- operating system;
- date and time of access;
- pages visited;
- referring website;
- technical identifiers; And
- information concerning the use of the website.

14.2. Such information may be processed for website operation, security, troubleshooting, statistical analysis and improvement of our digital services, subject to applicable law.

15. CHILDREN

15.1. The Event is primarily intended for adults participating in company sport activities.

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15.2. Where Personal Data concerning minors are processed in connection with accompanying persons, spectators, volunteers or specific Event activities, we will take appropriate measures to ensure compliance with applicable data protection law. Where consent is required for processing involving a child, parental or legal guardian consent will be obtained where required by law.

15.3. We do not knowingly collect children's Personal data for unrelated marketing purposes.

16. SENSITIVE INFORMATION

16.1. We generally ask that you not send us, and you not disclose, any sensitive information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic or biometric data, or sexual orientation) to us, except for self-reported disability status, proof of disability, or other health-related information that you provide directly to us as necessary for participation in the Event. In some circumstances you may have the option to provide us with such information, which we will only collect and process with your consent.

16.2. Subject to the provisions of applicable legislative or regulatory framework, none of this sensitive information will be shared with third parties, except in the aggregate and never in a form that is attributable to an individual. You will always have the option to decline to share such sensitive information with us.

17. YOUR RIGHTS

Subject to the conditions and limitations provided by applicable law, you may have the following rights:

17.1 Right of access to your Personal Data (Article 15 GDPR)

You have the right to obtain confirmation as to whether we process your Personal Data. In addition, you have the right to know which categories of your personal data we hold and process, to verify the lawfulness of the

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processing and to obtain information regarding the processing of your personal data, as provided by applicable law.

17.2 Right to rectification of your Personal Data (Article 16 GDPR)

You have the right to obtain from us without undue delay the rectification of your inaccurate Personal Data. Considering the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

17.3. Right to erasure - right to be forgotten (Article 17 GDPR)

You have the right to request the erasure of your personal data from our records where such data are no longer necessary for the purposes for which they were collected or otherwise processed, or where you wish to withdraw your consent, in cases where consent is the legal basis for the processing and there is no other legal ground for such processing.

17.4. Right to restriction of processing (Article 18 GDPR)

You have the right to request the restriction of the processing of your personal data in the circumstances provided for by applicable law.

17.5. Right to data portability (Article 20 GDPR)

You have the right to receive, in a structured, commonly used and machine-readable format, the personal data concerning you which you have provided to us and, where legally applicable, to request that such data be transmitted directly to another controller, where technically feasible and where the legal requirements for exercising this right are satisfied.

17.6 Right to object (Article 20 GDPR)

You have the right to object to the processing of your personal data where the applicable legal requirements for exercising this right are met. Where you object to processing based on legitimate interests, we will cease such processing unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the

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processing is required for the establishment, exercise or defence of legal claims.

17.7 Right to withdraw consent (Article 7 par. 3 GDPR)

Where the processing is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing carried out prior to its withdrawal.

17.8 Rights concerning automated decision-making

Where applicable, you may have rights concerning automated decision-making and profiling under Article 22 GDPR.

17.9. Please note that:

- the above rights may be exercised subject to the conditions, exceptions and limitations provided for under Regulation (EU) 2016/679 (the General Data Protection Regulation – GDPR) and the applicable national data protection legislation and regulatory framework.
- depending on the circumstances and the nature of the request, the exercise of certain rights may affect our ability to provide the relevant service to you, particularly where the processing of your personal data is necessary for the provision of such service or for compliance with a legal or contractual obligation.
- the exercise of your rights generally applies to future processing and does not, in itself, affect the lawfulness of processing carried out prior to the exercise of the relevant right or, where applicable, prior to the withdrawal of your consent.

18. HOW TO EXERCISE YOUR RIGHTS

18.1. To exercise your rights, please contact us:

Hellenic Organization for Company Sport and Health (HOCSSH)

166A Kifisias Avenue & Sofokleous Street

15126 Maroussi, Athens, Greece

E-mail: welcome@hocsh.org

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18.2. Please specify the nature of your request. Any request you submit should be accompanied by the necessary information and documentation required to verify your identity and enable us to process your request.

18.3. We will take all reasonable measures to respond to your requests and will provide a response without undue delay and, in any event, within one (1) month of receiving your request. This period may be extended by up to two (2) further months, where necessary, taking into account the complexity and number of requests. Where an extension is required, we will inform you of the extension and the reasons for the delay within the initial one-month period.

18.4. The exercise of your rights is generally free of charge. However, where a request is manifestly unfounded or excessive, in particular because of its repetitive character, the Company may, in accordance with applicable law, charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested, or refuse to act on the request.

19. RIGHT TO LODGE A COMPLAINT

19.1. If you believe that the processing of your personal data infringes applicable data protection law, you have the right to lodge a complaint with the competent supervisory authority, which, In Greece, is:

Hellenic Data Protection Authority (HDPa)

Kifisias 1-3

115 23 Athens, Greece

Website: www.dpa.gr

19.2. You may also contact the supervisory authority in the EU Member State where you have your habitual residence, place of work or where the alleged infringement occurred, subject to the applicable rules.

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20. CHANGES TO THIS PRIVACY POLICY

20.1. We may update this Privacy Policy from time to time to reflect (indicatively): changes to the Event, changes in applicable legislation, changes in our processing activities, changes in technology, changes in service providers or other organisational or operational developments.

20.2. The updated version will be published on the relevant website and will indicate the date of the latest update. Where required by applicable law, we will provide additional notice or obtain your consent.

21. CONTACT US

HOSCH welcomes question and comments regarding the protection of Personal Data. If you have any questions concerning this Privacy Policy or the processing of your personal data in connection with the European Company Sport Games Athens 2027, please contact:

HELLENIC ORGANIZATION FOR COMPANY SPORT AND HEALTH (HOCOSH)

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15126 Maroussi, Athens

Greece

Tel.: +30 212 0002527

E-mail: welcome@hocsh.org

22. FINAL PROVISIONS

22.1. These Terms are governed by Greek Law.

Any dispute shall fall under the jurisdiction of the Courts of Athens.

22.2. For further details, please refer to the Organiser's Privacy Policy, available at: <https://www.hocsh.org/privacy-policy/>

Athens, August 31, 2026

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