

“MANAGER OF THE YEAR” AWARDS

PRIVACY POLICY

1. INTRODUCTION

- 1.1. **S20 Media Lab Ltd** located at 6, Anastasi Andreou street, Apartment 201, 3081 Limassol, Cyprus, Registry No HE 361266 (hereinafter “**Company**”, “**We**”, “**Us**”) is committed to respect and protect Our privacy; This Privacy Policy refers to all professionals who apply for the Award “Manager of the Year” (the “**Award**”) as a candidate (the “**Candidate**” or “**You**”) and also under its capacity where applicable as a Member of the Thoughts Leaders Club and explains how and why We collect and process Our personal data, and in particular:
- The **type** of data We collect or produce about You.
 - The **purpose** of collection, the **processing activities** and the **legal basis** for such processing.
 - The **data retention** period.
 - The **recipients** of Our personal data and the **purpose** of such disclosure
 - Our **rights** and options regarding Our personal data
 - The **security measures** We undertake to store and protect Our personal data
 - The **contact details** of Our Company for any issue that may arise in relation to Our personal data.
- 1.2. We process Our personal data according to the provisions of the General Data Protection Regulation (GDPR 2016/679/EU) and any specific national legislation pertaining for the protection of personal data (including the decisions of the Hellenic Data Protection Authority).
- 1.3. We encourage You to consult this Policy regularly. When You submit Our application, We assume that You have read and understood this Privacy Policy and that You unconditionally agree with the processing of Our personal data in the ways described herein. In case You do not agree with Our Policy, please refrain from submitting Our application for the Award.
- 1.4. The Company is the **Data Controller** of Our personal data. You can contact Us for any comments, enquiries, observations or complaints regarding this Policy and the use of Our personal data by Us, as follows:
- By phone: +30 210 300 4808 / +357 977 90 177 / +30 697 6722 430
 - By e-mail: privacy@manageroftheyear.gr
 - Through post: **S20 Media Lab Ltd**, 6, Anastasi Andreou street, Apartment 201, 3081 Limassol, Cyprus

2. The TYPE of Personal Data We Collect about You

- 2.1. **Personal Data** is 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.
- 2.2. When You visit and navigate to Our Website (www.manageroftheyear.gr) and apply for the Award, We may collect either directly from You or from any third Party and process the following personal data about You:
- **ID** (name/ surname)
 - **Contact Details** (phone number (including mobile), e-mail address, postal address)
 - **Login Data** (username, password)
 - **Employment and other Professional Data:** (job title, employment history, qualifications, skills, professional achievements, references and recommendations etc.).
 - **Educational Background** (Academic qualifications, Institutions attended, Certifications and diplomas)
 - **Demographic Data** (date of birth, age, sex, place of residence, nationality, etc.)
 - **Photographs, Videos**

- **Social media and Online presence** (Linkedin Profile, Professional Website or portfolio, etc.)
- **Feedback and Evaluations:** Judges reviews, peer reviews, etc.
- **Additional Information:** Any other information You voluntarily provide with the application.

2.3. We do not knowingly collect any information from any person under the age of 18. The Award is addressed exclusively to people who are at least 18 years of age or older.

3. The PURPOSE of Processing Our Personal Data

3.1. We process Our personal data for the following purposes:

- **Evaluation of Eligibility:**
 - Assessing the candidate's qualifications and suitability for the Award.
 - Verifying the accuracy and authenticity of the information provided by the Candidate.
 - Assessing eligibility for the Thought Leaders Club (TLC).
- **Communication:**
 - Contacting Candidates for additional information or clarifications.
 - Informing candidates about the status of their application.
 - Notifying candidates of their selection or rejection.
 - For the Award related ceremonies and events invitations.
 - In relation to inquiries and clarifications
 - Communication for activating Account in the Thought Leaders Club (TLC).
- **Award Administration:**
 - Maintaining and Managing Accounts.
 - Organizing and managing the award selection process.
 - Coordinating award-related events or ceremonies.
 - Facilitating the delivery of the award.
- **Thought Leaders Club (TLC) Membership Management and Administration**
 - Maintaining and managing Members Accounts in the TLC,
 - Maintaining accurate Member records,
 - Managing memberships renewals and cancellations,
 - Organizing and managing the TLC selection process,
 - Coordinating TLC-related events or ceremonies,
 - Facilitating the communication within the Club.
- **Compliance with Legal Obligations:**
 - Ensuring adherence to applicable laws and regulations.
 - Responding to legal requests
 - Preventing fraud or other unlawful activities.
 - Maintaining Appropriate Legal Records
- **Publication:**
 - Announcing and promoting Award winners.
 - Publishing profiles or achievements of the winners on the Website or in press releases.
- **Event Coordination:**
 - Organizing and managing club events, meetings, and activities,

- registering participants and ensuring smooth event logistics.
- **Networking Facilitation:**
 - Enabling candidates and TLC's members to connect and collaborate with each other,
 - Providing candidates and TLC's members' directories or profiles to foster networking opportunities.
- **Archiving and Record-Keeping:**
 - Maintaining records of candidates and award recipients for historical or administrative purposes.
 - Ensuring the integrity and accuracy of award records.
- **Marketing & Promotion:**
 - Newsletters updates,
 - event invitations,
 - promoting Awards and TLC's activities,
 - events and achievements,
 - sharing success stories, testimonials etc.
- **Financial Administration:**
 - Processing registration to events / ceremonies' fees,
 - generating financial reports and ensuring financial accountability.
- **Feedback and Improvement:**
 - Gathering feedback to improve the Award process,
 - conducting surveys or research to enhance Our programs and initiatives.
- **Internal Analysis and Reporting:**
 - Analysing application data for statistical and reporting purposes.
 - Assessing trends and insights to improve future award processes.
 - Evaluation and improvement of business processes
 - Improving responsiveness and management of the Website
 - Research and evaluation to improve existing services and develop new ones
 - Adopting new commercial and business models, programs and partnerships.
- **Security and Fraud Prevention:**
 - Protecting the integrity and security of member data,
 - Monitoring for and preventing fraudulent activities.

4. The LEGAL BASIS for Processing Our personal data

4.1 We process Our personal data based on the following legal grounds:

- **Consent:** You have given clear consent for us to process Our personal data for the specific purposes outlined in this policy.
- **Contract:** Processing is necessary for the performance of the Contract for Our participation in the Awards and the TLC to which You are a party
- **Legal Obligation:** Processing is necessary for compliance with a legal obligation to which We are subject.
- **Legitimate Interests:** Processing is necessary for the purposes of Our legitimate interests, except where such interests are overridden by Our interests or fundamental rights and freedoms.

- 4.2 Where Our **consent** is the legal basis for processing, You can withdraw it at any time. Consent withdrawal is valid for the future. The processing carried out up to the point of withdrawal shall be deemed to be lawful in all respects.
- 4.3 Where the legal basis for processing Our data is Our Company's **legitimate interest**, You can opt-out at any time by requesting that We stop accessing Our personal data for this purpose. For example, You can request that We do not send You commercial communications by e-mail or other means (sms, viber) by opting out, by clicking on the unsubscribe button, in any case, by contacting us. In any case, We inform You that the Company reserves the right to demonstrate its own legitimate interest in the continuation of processing, provided that this is justified following a fair balance between Our own interests in the protection of Our personal data and its own legitimate purposes and/or other compelling reasons.
- 4.4 If You are eligible to become a Thoughts Leaders' Club (TLC) Member, We automatically create a Membership Account for You, hoWever We need Your consent to activate it. If You wish not to participate in the TLC, Your Account to the Club will be automatically deleted.
- 4.5 Our Company is not responsible if communication is sent to media that You do not check and/or do not use if You have not informed the Company of Our preferred means of communication or any change to Our contact details.

5. Whom We SHARE Our personal data with and WHY

- 5.1 We may share Our personal data with:
- Members of the Award judging panel for evaluation purposes.
 - Third-party service providers who
 - assist us in managing the Award process and organizing events.
 - Assist us in marketing and communications
 - IT Services (hosting, security etc)
 - Media outlets and the public for the purpose of announcing and promoting Award winners.
 - Legal and regulatory authorities as required by law.
- 5.2 We reserve the right to disclose Our personal data to a third party to whom We may choose to transfer all or part of Our business. In addition, in the event of a merger or acquisition, or other change in Our business, the new owners, shareholder, directors, etc. have the right to use Our personal data in the same way as set out in this Policy.
- 5.3 Our personal data may be disclosed to the competent judicial, police and other administrative authorities upon their lawful request and in accordance with the applicable legal provisions. In addition, in the event of a legal provision, an official order or an official preliminary investigation, the Company shall have the right to make the relevant data available to the relevant authority without any further request.

6. TRANSFER of Our personal data to THIRD COUNTRIES

The Company generally maintains and processes Our personal data within the European Economic Area ("EEA"). We do not routinely transfer data outside the EEA. Where Our data is to be transferred to third countries outside the EEA or to international organizations for which there is no adequacy decision by the European Commission, all appropriate safeguards under applicable data protection legislation for transfers to third countries shall be taken.

7. SECURITY of Our personal data

Our Company undertakes appropriate technical and organizational measures to protect the personal data We keep so that they are not exposed to incidents of unauthorized access, disclosure, use, modification or destruction. Where appropriate, We use encryption and other technologies that can help secure the data You provide to us. We also require that Our service providers comply with strict requirements for the protection and security of personal data. In particular, the information You submit to the Company is handled exclusively by Company personnel who are specifically trained to handle personal data in compliance with applicable laws, and who under Our control and act only at Our instructions. To carry out the processing, the Company selects and contracts with persons or third-party partners who have corresponding professional qualifications that provide adequate guarantees in terms of technical knowledge and personal integrity to ensure compliance with confidentiality, security measures and the protection and safeguarding of the confidentiality and integrity of personal data. In any case, their security in the environment of the Website is provided without prejudice to incidents beyond the Company's sphere of control, technical or other network failures beyond the Company's control or due to force majeure or fortuitous events. You must not disclose the details/passwords You have provided when opening Our Account, which is personal and non-transferable. Our Company carries out regular quality and security checks on the systems and algorithms used to correct any factors that lead to data inaccuracies.

8. Personal Data RETENTION Policy

- 8.1. We will retain Our personal data only for as long as necessary to fulfil the purposes for which it was collected and to comply with legal, accounting, or reporting requirements. Simultaneously, We will keep Our personal data for legitimate interests tied to Our legal protection in case of a dispute related to the sales contract, account maintenance, business policy or any other transaction according to the applicable legislation. When processing data proactively based on Our legitimate interest, We will keep such data until You request deletion, withdraw Our consent, or object to processing.
- 8.2. You have the right to request the deletion of Our data. If You object to their processing or withdraw Our consent, where those legal bases apply, We are obligated to delete the data and not retain it. However, We reserve the right to withhold Our respective rights to support a legal claim of Our Company, as detailed in the analysis of Our rights provided in the table below in section 9.
- 8.3. Account in the Platform: Our account shall be retained until You request to close/delete it by sending an e-mail to the Company or in case the respective right is activated regarding Our legal right to delete Our account.

9. Our RIGHTS and how to exercise them

- 9.1. With respect to Our personal data that We possess and process, You have the rights set out in the table below. **Please note that, in some cases, if You ask us to stop processing Our personal data, We will not be able to provide You with certain services.**

Right (articles below refer to GDPR)	Explanation
Right to access (article 15)	You can request to: <ul style="list-style-type: none">– Confirm that Company processes Our personal data.– Provide You with access to any personal data that You do not already have at Our disposal– Provide You with other information about Our personal data, such as what data Company has, what it uses it for, to whom it might transfer it, whether it transfers it abroad, how it protects it, how long it retains it, what are Our rights as a data subject, the process to submit a complaint, the sources

	of Our data (to the extent such information has not already been provided in this Policy).
Right to rectification (article 16)	You can request to rectify inaccurate personal data. Company may seek to verify the accuracy of the data before it rectifies it.
Right to deletion / erasure (article 17)	You can request Company to erase Our personal data in case: <ul style="list-style-type: none"> – You have withdrawn Our consent – at any time when they are no longer needed for the purposes of the Awards – if they have been illegally collected – when You object to the processing (or opt-out) Company is not obliged to comply with a request to erase such data if the processing is necessary: <ul style="list-style-type: none"> – for compliance with a legal obligation – for the fulfillment of another legitimate purpose or another legitimate legal basis – for the establishment, exercise or defense of legal claims
Restriction of processing (article 18)	You can ask us to restrict the processing of Our personal data when: <ul style="list-style-type: none"> – their accuracy is contested (see rectification), so that We can verify the accuracy of the personal data or – the personal data have been unlawfully processed but You oppose to the erasure of the personal data or – they are no longer necessary for the purposes, which they Were collected for, but You still need them for the establishment, exercise or defense of legal claims or there is another legitimate purpose of processing or other legal basis. – You have exercised Your right to object, and You await its verification
Right to Data Portability (article 20)	When processing is based on Our consent and is carried out by automated means, You may request that We provide Our personal data in a structured, commonly used and machine-readable format, or You may request to be transferred directly to another controller. HoWever, this right concerns only the data provided by the data subject and not any data produced by the controller based on already collected data.
Right to object (article 21)	You may at any time object to any processing of Our personal data, which is based on the legitimate interest of the Company, or the performance of a task carried out for reasons of public interest. If You exercise Our right to object, the Company has the right to demonstrate compelling legitimate grounds for the processing which override the rights and freedoms of the data subject, hoWever Our fundamental rights and freedoms will not be affected.
Right not to be subject to automated individual decision-making, including profiling (article 22)	Company doesn't make decisions based solely on automated processing of Our personal data for the purposes of the Services. In any case, We inform You that You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning You or similarly significantly affects You.

Opt-out (from consent)	You have the right to withdraw Our consent, where consent is the basis for the processing. Any withdrawal is valid for the future and any processing conducted by the Company up until the point of withdrawal, is lawful.
Right to lodge a complaint before the competent Supervisory Authority	<p>You have the right to lodge a complaint with the local competent Supervisory Authority that may occur in relation to all personal data processing activities. You can find more information here. The Supervisory Authority for personal data protection in Greece is the Hellenic Data Protection Authority (www.dpa.gr).</p> <p>Postal Address: Kifisias ave1-3, PC 115 23, Athens Phone: +30 210 6475600 Fax: +30 210 6475628 email: contact@dpa.gr</p> <p>HoWever, We consider it Our obligation and duty to handle any concerns You may have about Our personal data that We process, so We will be happy to contact You to resolve any questions and address any issues that concern You!</p>

- 9.2. **Exercising Our Rights:** We offer You easy ways to exercise these rights, such as "unsubscribe" links, or at the phone number +30 210 300 4808, by sending an email to privacy@manageroftheyear.gr, by sending a simple mail to the post office **S20 Media Lab Ltd**, 6, Anastasi Andreou street, Apartment 201, 3081 Limassol, Cyprus, to the attention of the Data Protection Officer.
- 9.3. **Identity verification:** We respect the confidentiality of all records containing personal data and We reserve the right to ask You for proof of Our identity if You make a request for such records.
- 9.4. **Cost:** We will not charge You for exercising Our rights in relation to Our personal data unless, as provided by law, Our request for access to information is unfounded or excessive, in which case We may charge a reasonable fee based on the circumstances. We will inform You of any charges before We complete Our request.
- 9.5. **Timeframes:** We aim to respond to any valid requests no later than one (1) month after receiving them, unless it is particularly complex or You have submitted several requests, in which case We aim to respond within three months. We will let You know if We are going to take longer than one (1) month for the reasons set out above. We may ask You if You can tell us exactly what You want to receive or what it is that You are concerned about. This will help us to act more quickly on Our request.
- 9.6. In any case, You must provide specific and true information and/or facts in order for us to be able to respond and/or accurately satisfy Our request, otherwise We reserve the right to any errors which are beyond Our control. Our Company may also refuse requests that are unfounded, excessive, abusive, in bad faith or generally unlawful, to the extent permitted by law.

10. CHANGES to this Data Protection Policy

- 10.1. This Policy was last updated on 13/05/2024 and replaces all previous communications that may have been provided in the past regarding Our privacy practices in relation to the processing of Our data.
- 10.2. To ensure that You are always aware of how We process Our personal data, We will update this Policy to include new services and the processing of Our data related to them, as Well as changes to Our existing processing of Our personal data. In addition, We may amend this Policy to comply with any changes in the legal and regulatory framework.
- 10.3. If You do not agree with the amendments, You must not take any action or use the Site and the Platform, much less provide any personal data. In any event, You acknowledge and agree that participation in the Award and the TLC, after any modifications, constitutes confirmation of Our reading and acceptance of this Policy. If You wish to be provided with any clarification or information regarding the changes or have any reservations or questions about them (the changes), You may contact us at the contact details listed above. Information and clarification provided to You regarding the changes above does not constitute a replacement or modification of this Policy. Please read this Policy carefully and refer to it regularly to obtain the latest information about Our privacy safeguarding policies. Any changes to this Policy will be posted immediately here.