



**PRIVACY NOTICE RELATED TO THE OPERATION OF A SUPPLIER - SOURCING
& CONTRACTS MANAGEMENT ELECTRONIC PLATFORM**

Issue: September 2025

1. Context and Data Controller

Pursuant to the provisions of EU Regulation 2016/679 (General Data Protection Regulation, or "GDPR") and Hellenic Law 4624/2019 (Gov. Gazette Issue A'137/29.8.2019), "Athens International Airport S.A." ("AIA", "Us", "We"), is the Data Controller of any personal data provided by tenderers in the course of procurement processes.

Additionally, the tenderer who uses and invokes the personal data of the data subjects/individuals to the proposal submitted to AIA in the course of a given procurement procedure, is also a Data Controller for the processing of such data, bearing the respective legal obligations for the fair and lawful use of such personal data.

Processing operations are under the responsibility of the Controller, indicated in the invitation to tender, regarding the collection and processing of personal data.

2. What Personal Data We Collect

2.1. When you create a user account in the Digital Procurement Platform as a contact person for the potential supplier/tenderer, we may collect and process the following information:

- Full Name
- Business contact details (email address, phone number, company address)
- Job title/role
- Company Legal name
- Company Tax ID
- Any additional information required for onboarding, due diligence, and supplier management

2.2. During the e-tender process that may follow, additional personal data shall be collected and further processed concerning the tenderer and/or its staff or Subcontractors (data subjects). Information may relate to the following data:

- Full Name
- Job Title/ Professional Capacity;
- Contact details (e-mail address, business telephone number, mobile telephone number, postal address, company and department, country of residence, internet address);
- Certificates for social security contributions and taxes paid extract from judicial records;

- Tax ID number, passport number, ID number;
- Information for the evaluation of selection criteria or eligibility criteria: expertise, technical skills and languages, educational background, professional experience including details on current and past employment;
- Solemn Declarations

3. Personal Data Processing Purposes

We process your personal data for the following purposes:

- To register and manage your supplier/tenderer account and contact person details;
- To communicate with you regarding your registration, onboarding, and ongoing supplier relationship;
- To evaluate, as the case may be, the technical and professional capacity of tenderers and their staff, experts, and Subcontractors, proposed by the tenderer at the submission of their offer, as per the specific requirements of the services/works tendered.
- To conduct due-diligence and compliance checks;
- To fulfil our contractual obligations and manage our business relationship;
- Personal Data provided (e.g. CVs, Certificates, or Solemn Declarations) together with other tender information may be used as evidence in the course of any legal actions in connection with the said tender, or the subsequently concluded agreement;
- Any other purpose which in the course of a procurement procedure is relevant or appropriate to the scope or the management and administration of procurement procedures by AIA in compliance with AIA's Procurement Policy & Framework (POLICY-PRC-010101-PL-R3).
- To comply with legal and regulatory requirements.

4. Legal basis for Processing

We process your personal data based on:

- Our legitimate interests in selecting appropriate suppliers/vendors/service providers and managing supplier relationships, (Article 6(1)(f) GDPR);
- Contract performance, in the occasion of entering into a contract with you, or the company you represent (Article 6(1)(b) GDPR);
- Compliance with legal obligations (Article 6(1)(c) GDPR), especially the Airport Development Agreement ("ADA"), ratified by Law 2338/1995 as amended and ratified by virtue of Laws 4594/2019 and 5080/2024 and AIA's Procurement Policy & Framework (PRC-010101-PL-R3);
- Your consent, where required (Article 6(1)(a) GDPR)

5. Means of Collection – Processing - Data Security

Personal data is provided by the tenderer and/or its contact person during the creation of a supplier account on our e-platform, in submission of the respective proposal, as part of information presented for evaluation, the latter assuring that all submitted data are valid and accurate at the time of the submission of the proposal and as such may be relied upon.

The tenderer is obligated to have a valid lawful basis for the processing and further submission to AIA of the personal data of any person (staff, experts, Subcontractors) whose personal data are included or invoked in any way in the proposal, as per GDPR requirements,

The information is collected through AIA's designated Digital Procurement Platform, in compliance with the platform's Terms of Usage (available here: <https://aia.ivalua.app/>), or through direct communication with our Procurement Agents in digital or printed files.

The collected personal data and all related information are stored on Ivalua Private Cloud - France datacenters (Telehouse TH3/Equinix PA2) to which access is regulated through corporate security and IT&T procedures. We ensure that appropriate safeguards are in place for any data sharing, especially if data is transferred outside the European Economic Area.

Ivalua does not outsource any of our core functions to deliver their services. Ivalua does use highly secure data center colocation services to host Ivalua owned and managed infrastructure equipment that stores and processes customer data. The data center provider does not get access to any customer data. Ivalua periodically reviews the security controls at the data center locations.

6. Accessibility & Disclosure

For the purpose detailed above, access to the proposal information and any personal data contained therein is given to:

- The appointed Evaluation Committee and any assigned advisors thereto, who are bound by appropriate Non-Disclosure Statements;
- External evaluators/advisors, the contact details of which are available by AIA's Procurement Department;
- The authorized employees of AIA's Procurement Department, responsible to carry out any actions in relation with the tender.
- Regulatory Authorities, or other third parties, where required by Law.

7. Vendors

The following entities provide support to the e-procurement platform and are obligated to maintain confidentiality:

Entity Name	Service Provided	Address	Contact (email)
PricewaterhouseCoopers Business Solutions SA	Performance of contracted obligations (support of the business and maintenance of the platform)	65 Kifissias Avenue, Marousi 15124, Athens, Greece	melpomeni.xydi@pwc.com
Ivalua SAS	Performance of contracted obligations (Provision to AIA of a SaaS platform for the management of e-procurement, execution of e-tenders, maintenance of supplier registry, as set out in the Scope of Works of the Agreement and maintenance of the platform)	102 Avenue de Paris - 91300 Massy - France	Privacy@ivalua.com

8. Personal Data Retention Period

- Supplier Account details are retained for five (5) years following the completion of the Agreement (or until deleted by the user).
- Tender files submitted during the tender procedures, including personal data, are to be retained in AIA until the conclusion of the tender process, and in the archives for a period of five (5) years, following the completion of the relevant Agreement with the preferred bidder, in accordance with AIA's relevant policy.
- Tender files submitted during the tender procedures, including personal data, are to be retained until the end of a possible audit if one started before the lapse of the above period.
- After the period mentioned above has elapsed, the tender files containing personal data may be sampled for historical purposes. The non-sampled files are destroyed.

9. Data Subjects' Rights

GDPR gives Data Subjects the right to be able to affirm that their personal data is being processed lawfully. In specific, Data Subject have the following rights:

- (i) Right to access the data kept by AIA
- (ii) Right to request the rectification of your inaccurate data
- (iii) Right to request the erasure of your data, in certain circumstances
- (iv) Right to restrict the processing of your personal data, under specific conditions
- (v) Right to request the transfer of the data kept by AIA to any other Data Controller without undue hinderance (Right to Portability)

Any such request must be made following communication with the tenderer, in his capacity as Data Controller of such Data or AIA's assigned Data Protection Officer, as mentioned in par. 6. However, the exercise of certain rights (e.g. the right of erasure, rectification, restriction) may be denied on the basis of affecting the validity of the proposal submitted, as well as the transparency and integrity of the procurement process.

10. Contact information to AIA

In compliance with GDPR articles 37-39, a Data Protection Officer (DPO), has been appointed by AIA's Management, with main accountabilities, to address required actions for establishing and maintaining a data protection management system in AIA, in compliance with the Regulation. The appointed DPO's details are:

Mr. Joseph St. Avramides
Manager, Regulatory Compliance Data Protection and Ethics
Athens International Airport S.A, Administration Building 17, (B17)
190 19 Spata, Attica
Tel. 210 35 37 211, Email: avramidesj@aia.gr, privacy@aia.gr

11. Contact information to Hellenic Data Protection Authority

Data Subjects are hereby informed of their right to lodge a complaint against AIA as regards the processing of their personal data before the competent Hellenic Data Protection Authority "www.dpa.gr" or any other co-competent Authority as per GDPR. Further information should be sought by contacting the aforementioned Authority.

We may update this privacy notice from time to time. The latest version will always be available on the Digital Procurement Platform.