

UNIVERSAL EDUCATION S.A. has the obligation to protect the personal data of its customers, as well as any other person about whom it processes information, and to preserve the confidentiality of communications to the extent that this depends on its information systems.

The policy sets out how the Company and its staff achieve compliance with these obligations.

The purpose of the Privacy Policy is:

- The Company's compliance with legal and regulatory obligations to protect personal data and ensure the confidentiality of communications.
- The protection of the privacy of all personal data managed by the company.

The policy concerns staff members and associates of the company, who have or may gain access to personal data, as well as those who may have access or are involved in any way in the communications of its customers.

The policy is mandatory and is an integral part of the Information Security Management System (S.D.A.P.), which is applied, and all those who work for the company or cooperate with it have the obligation to contribute to the protection of personal data.

Safety Instructions and Rules

- The Company processes personal data of its customers only after they have been informed and if it has the consent of its customers, as defined by the Law.
- The Company informs its customers about the processing of their personal data, as defined by the relevant legislation.
- The Company processes personal data of its employees only for reasons related to the exercise of their work.
- The Company does not transfer or disclose its customers' data to third parties, except by court or prosecutor's order or when required by law. In any other case, the explicit consent of the subject is required.
- The processing of data relating to the Company's customers is done only for the purposes related to the provision of services to them.
- The collection of personal data is limited only to data that is necessary for the fulfillment of contractual and legal obligations of the company.
- The access of the company's staff to the personal data of its customers is limited based on the need-to-know principle.
- The company's customers have the right to access the information that concerns them. For the exercise of this right, the Company may request the payment of a reasonable fee. The price is paid to cover expenses of the Company, therefore the Company does not enjoy profit from it.
- Customers have the right to request the correction of their personal information that is untrue or inaccurate.
- The Company does not monitor or record the content of its customers' communications.

SIGNATURE

Andreas Rodopoulos
Vice President & CEO