

PRIVACY POLICY

Last updated: 01/10/2026

1. WHO WE ARE

STEALTH WEALTH ART P.C. (in Greek: STEALTH WEALTH ART I.K.E.), a private company (IKE) established under Greek law with the distinctive title "The Elite Guide for Destination Weddings in Greece" ("SWA", "we", "us" or "our"), is the controller of the personal data described in this Policy. We process these data in connection with the website <https://stealthwealthart.com/> (the "Website") and the online guide to destination wedding planners in Greece "Stealth Wealth Art, The Elite Guide" (the "Guide").

- Registered office: 24 Agrafon Street, Rodopoli, Municipality of Dionysos, Attica 14574, Greece
- General Commercial Registry (G.E.MI.) No.: 195448603000
- Tax Identification No. (A.F.M.): 803368096
- Email for privacy matters: elite@stealthwealthartpc.com

We have not appointed a Data Protection Officer, as the law does not require us to. For any question about your personal data, please write to us at the email address above.

This Policy is drawn up under Regulation (EU) 2016/679 (General Data Protection Regulation, "GDPR") and Greek Law 4624/2019. Capitalised terms not defined here have the meaning given to them in our Terms of Use.

2. SCOPE OF THIS POLICY

This Policy applies to the following persons:

- visitors of the Website;
- couples who submit a review or ask us to forward an enquiry to a Planner;
- wedding planners listed in the Guide (the "Planners") and the contact persons of planning businesses;
- couples whose names appear in agreements that Planners send us for verification;
- persons who appear in photos published in the Guide;
- authors of articles in the section "Behind the Veil";
- anyone who contacts us.

This Policy does not cover the processing that Planners carry out for their own purposes, including when they receive an enquiry that we forward. Each Planner is a separate controller and is responsible for that processing. The use of cookies is described in our Cookies Policy.

3. WHAT DATA WE PROCESS, WHY AND FOR HOW LONG

Providing personal data to us is not a legal obligation. However, without the data requested in each case we cannot publish a review, forward an enquiry or list a Planner.

The Website does not offer user accounts and does not allow visitors to upload content. Couples and Planners send us reviews, photos, material and documents by email at elite@stealthwealthartpc.com. We enter the content to be published on the Website ourselves.

3.1 Visitors of the Website

- Data: IP address, type of browser and device, pages visited, date and time of the visit.
- Purpose: to operate the Website and protect its security.
- Legal basis: our legitimate interest in operating a secure website (Article 6(1)(f) GDPR).
- Retention: five (5) years.
- Analytics: with your consent, we use Google Analytics to measure how visitors use the Website. Google processes these data on our behalf. The legal basis is your consent (Article 6(1)(a) GDPR), which you may withdraw at any time. Details are set out in our Cookies Policy.

3.2 Couples who submit a review

- Data: your names and email address, the Planner you review, the date and place of your wedding, your review and rating, any photos you send and the proof of your booking. We ask that the copy of the proof shows only the names of the parties, the date and place of the wedding and the name of the Planner and that all other information is covered. Before publication we confirm with you in writing which of these data are published with your review.
- The proof of booking is subject to the same safeguards as the agreements described in section 3.5.
- Purposes and legal bases:
 - to verify that the review comes from a couple who booked the Planner: the legitimate interest of SWA and of the users of the Guide in reviews being genuine (Article 6(1)(f) GDPR);
 - to publish the review on the Website and on the Guide's social media accounts and to communicate with you about it: performance of the Terms of Use, which you accept in writing before publication (Article 6(1)(b) GDPR);
 - to keep the reviews of a Planner who leaves the Guide, so that a Planner cannot remove its reviews by leaving and rejoining: our legitimate interest in the reliability of the ranking (Article 6(1)(f) GDPR).
- Retention:

- the copy of the proof is deleted, together with the email that contained it, as soon as the verification is completed. We keep only a record that the review was verified and the date of the verification;
- your review is kept until you ask us to remove it;
- if the Planner leaves the Guide, your review is no longer displayed and is kept for five years, so that it is displayed again if the Planner rejoins within that period;
- after a review is removed, we keep it together with the record of its verification for five years from its removal, a period set by reference to the five-year limitation period for claims in tort under Greek law (Article 937 of the Greek Civil Code), in case they are needed to establish, exercise or defend legal claims.

3.3 Couples who ask us to forward an enquiry

Where you ask us by email to forward an enquiry to a Planner:

- Data: your names, your contact details, the date and place of your wedding and the content of your enquiry.
- Purpose: to forward your enquiry to the Planner you choose.
- Legal basis: performance of the Terms of Use, at your request (Article 6(1)(b) GDPR).
- Recipient: the Planner, who from that point processes your data as a separate controller.
- Retention: five (5) years after the enquiry is forwarded.

3.4 Planners and their contact persons

- Data: name, business name, contact details, the material for the profile (texts, photos, description of services), our communications, the data used for the ranking (verified reviews and response consistency) and, for paid services, invoicing data and the details shown in the payments we receive (name of the payer and bank).
- Source: the Planner itself, by email, including for the data of its contact persons.
- Purposes and legal bases:
 - listing and maintaining the profile, promoting it on the Guide's social media accounts and providing paid services: performance of the Terms of Use accepted by the Planner (Article 6(1)(b) GDPR). For the contact persons of planning businesses, our legitimate interest in communicating with the Planner (Article 6(1)(f) GDPR);
 - verifying the Planner and calculating the ranking: the legitimate interest of SWA and of the users of the Guide in presenting genuine professionals and a reliable ranking (Article 6(1)(f) GDPR);
 - invoicing and bookkeeping: compliance with our legal obligations (Article 6(1)(c) GDPR).
- The ranking is calculated automatically, by applying the same formula to all Planners, as described in section A3 of the Terms of Use. A Planner who

considers that its ranking is not correct may ask for it to be examined by our team, as described in section B7 of the Terms of Use.

- Retention: for as long as the Planner is listed in the Guide. When the Planner leaves, we delete its material. Posts already published on the Guide's social media accounts remain online, unless the Planner asks us to delete them. We keep only the following:
 - invoices and accounting records are kept for the period required by Greek tax law, that is at least five years from the end of the relevant tax year and longer where the tax authority's right to assess tax has not yet become time-barred (Article 13(2) of the Tax Procedure Code, Greek Law 5104/2024);
 - our correspondence and records relating to reviews, the ranking or disputes are kept for five years from the Planner's departure, a period set by reference to Article 937 of the Greek Civil Code, in case they are needed to establish, exercise or defend legal claims.

3.5 Couples whose names appear in an agreement that a Planner sends us

This section is written so that Planners can forward it to the couples concerned.

When a wedding planner asks to be listed in the Guide, it sends us by email a copy of one agreement it has concluded with a couple for a wedding that has already taken place, so that we can confirm that the Planner actually organised that wedding. The copy shows only the names of the parties, the date and place of the wedding and the name of the Planner. All other information is covered.

- Data: your names and the date and place of your wedding.
- Source: the Planner.
- Purpose: to verify the Planner, as an internal check only.
- Legal basis: the legitimate interest of SWA and of the users of the Guide in presenting genuine professionals (Article 6(1)(f) GDPR).
- Safeguards: the copy
 - is used only for this internal check;
 - is not stored on the Website or in its database and is not accessible through the Website;
 - is not published;
 - is not disclosed to anyone, except to the provider of our email service, which hosts it on our behalf until it is deleted, or where the law requires disclosure.
- Retention: the copy is deleted, together with the email that contained it, as soon as the verification is completed. We keep only a record that the Planner was verified and the date of the verification, which contains no data about you.
- You may object to this processing at any time, as described in section 7.

3.6 Persons who appear in photos in the Guide

- Photos in the profiles of Planners are provided by the Planner, who confirms to us that the persons who can be recognised in them, or for minors their parents or guardians, have agreed to their publication in the Guide and on its social media accounts. The Planner keeps evidence of that agreement. Photos in reviews are provided by the couple who submits the review, under the same condition.
- Legal basis: your consent, given to the Planner or to the couple for publication in the Guide and on its social media accounts (Article 6(1)(a) GDPR).
- If you appear in a photo and do not wish it to be published, write to us and we will remove it without undue delay. You do not need to give reasons.
- Retention: for as long as the profile or the review is published.

3.7 Authors of articles in Behind the Veil

- Data: name, professional details and the content of the article.
- Purpose: to publish the article in the section "Behind the Veil".
- Legal basis: the agreement with the author for the publication of the article (Article 6(1)(b) GDPR).
- Retention: for as long as the article is published and, after that, for as long as needed to establish, exercise or defend legal claims.

3.8 Persons who contact us

- Data: your name, your contact details and the content of your message.
- Purpose: to reply to you and handle your request, including notices and requests under the Terms of Use.
- Legal basis: our legitimate interest in replying to the messages we receive (Article 6(1)(f) GDPR) or, where your request concerns the use of the Guide, the performance of the Terms of Use (Article 6(1)(b) GDPR).
- Retention: five (5) years after the matter is closed, unless the data are needed to establish, exercise or defend legal claims.

3.9 Our pages on social media

When you visit or interact with the pages of the Guide on Facebook or Instagram, Meta Platforms Ireland Limited processes your data under its own privacy policy. For the statistics about the use of our pages that Meta provides to us, we and Meta act as joint controllers under the terms that Meta makes available for this purpose and you may exercise your rights directly with Meta.

4. WHO RECEIVES YOUR DATA

- The public: reviews and profiles published in the Guide are visible to every visitor of the Website.
- Planners: the enquiries that we forward to them at your request.
- Service providers acting on our behalf (processors), such as providers of website hosting, email, website analytics (Google Analytics), website

development and maintenance and accounting services. They are bound by contracts under Article 28 GDPR and process the data only on our instructions.

- The banks through which Planners pay us, including through IRIS, which act as separate controllers.
- Public authorities and courts, where the law requires it.
- Our legal and professional advisers, who are bound by confidentiality.

We do not sell personal data.

5. TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

Where a service provider transfers personal data outside the European Economic Area, the transfer is based on an adequacy decision of the European Commission or on standard data protection clauses adopted by the European Commission (Articles 45 and 46 GDPR). You may obtain a copy of these safeguards by writing to us.

6. SECURITY

We apply appropriate technical and organisational measures to protect personal data (Article 32 GDPR), including access restricted to the persons who need it. We ask couples and Planners to send us copies with all unnecessary information covered. Documents sent to us for verification are not stored on the Website. We delete them, together with the emails that contained them, as soon as the verification is completed.

In the event of a personal data breach, we notify the Hellenic Data Protection Authority within 72 hours where this is required and we inform you where the breach is likely to result in a high risk to your rights and freedoms (Articles 33 and 34 GDPR).

7. YOUR RIGHTS

You have the right to:

- access your personal data (Article 15 GDPR);
- have inaccurate data corrected (Article 16 GDPR);
- have your data erased (Article 17 GDPR);
- restrict the processing (Article 18 GDPR);
- receive the data you provided to us in a structured, commonly used and machine-readable format, where the processing is based on your consent or on a contract and is carried out by automated means (Article 20 GDPR);
- withdraw your consent at any time, without affecting the lawfulness of processing before the withdrawal (Article 7(3) GDPR).

Right to object. You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data that is based on our legitimate interest (Article 21 GDPR). We then stop the processing, unless we demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing is needed to establish, exercise or defend legal claims.

To exercise your rights, write to us at elite@stealthwealthartpc.com. We may ask you to confirm your identity. Exercising your rights is free of charge. We reply within one month, which may be extended by two further months where necessary, taking into account the complexity and number of requests. In that case we inform you of the extension within the first month (Article 12(3) GDPR).

8. RIGHT TO LODGE A COMPLAINT

If you consider that the processing of your personal data infringes the law, you may lodge a complaint with the Hellenic Data Protection Authority, 1-3 Kifissias Avenue, 115 23 Athens, Greece, website www.dpa.gr, email contact@dpa.gr, telephone +30 210 6475600, or with the supervisory authority of the country where you live or work.

9. MINORS

The Guide is intended for adults. Reviews and enquiries may be submitted only by persons who are at least 18 years old. Photos in which minors can be recognised are published only with the agreement of their parents or guardians.

10. CHANGES TO THIS POLICY

We may update this Policy. We publish the updated version on the Website with its date and, in the case of significant changes, we inform users on the Website.