

Data Privacy Notice

The Public Limited Company (Company) under the company name “Piraeus Financial Holdings”, which has its registered head office in Athens (4 Amerikis Str.), VAT No.: 094014298, Tax Office: Athens Tax Office for Commercial Companies (FAEE), General Commercial Registry (GEMI) No.: 225501000, in its capacity as the Controller of Personal Data, hereinafter referred to as the “Company”, in the context of the General Data Protection Regulation (EU) 2016/679 which shall enter into force on 25/05/2018, hereinafter referred to as the “GDPR”, as currently applicable, shall hereby provide the following update on the processing of your personal data and your rights as the data subject. The new Regulation shall replace the existing legal framework on the protection of individuals from the processing of personal data. As of the aforementioned date, any reference in the provisions of Law no. 2472/1997 shall refer to the provisions of the new “GDPR”, as well as Law 4624/2019, as in force, which includes measures for the implementation of the GDPR

This notice is addressed to individuals who perform any transaction with the Company, including but not limited to Customers who have maintained a permanent relationship with the Company or passing Customers, their respective legal representatives, as well as their special or universal successors, to representatives of legal persons and to any natural person who has business relations with the Company in any capacity.

Personal data processing is the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, transmission, restriction or erasure of personal data which was or will be brought to the attention of the Company, either as part of your business relations with it or as part of any update which is received by the Company from any third party, a natural or legal person or public sector body, while exercising a legal right of their own or the Company.

In compliance with the current legislative framework, the Company has taken all steps required, by implementing all appropriate technical and organizational measures for the lawful adherence, processing and safe retention of personal data files, and is committed to

ensure and protect in every way the processing of your personal data against any loss or leakage, alteration, transfer or any other unlawful processing.

A. Which personal data we process and where we collect them from

- The Company processes your personal data, which you or your legal representatives have submitted or will submit to the Company, which are necessary for the commencement, continuation and execution of your business relations with the Company, either existing or future ones, depending on the product or service provided and the current applicable procedures and policies of the Company. The personal data you provide the Company with / submit to the Company must be complete and accurate and shall be diligently and immediately updated by you, in case they were altered or whenever deemed necessary by the Company in order to preserve your business relations or to fulfill any of its obligations pursuant to the law and the respective applicable regulatory provisions.
- The Company shall also process your personal data which were received or brought to its attention by any third party, a natural or legal person or public sector body, and which are necessary either to achieve the Company's or any third party's legitimate interests, or to perform the Company's tasks which are carried out in the public interest (e.g., tax and insurance bodies).
- The Company may also process your data which it has collected from other third parties, such as publicly accessible sources (e.g., Commercial Registries, Internet), provided that said data are necessary for the purposes of the processing.
- In order to initiate and continue its business relationship with its Customers and to open a deposit account for any individual, the Company shall collect and process at least the following personal data: Full name, father's name, details of identity card/passport or any other official identification document, permanent residence, home address, correspondence address, email address, business details and business address, tax residence, tax identification number, telephone number (fixed and /or mobile) and specimen of signature (physical or electronic). Where appropriate, you may be requested to submit additional details, provided that these data are considered as prerequisite for the commencement or continuation of a specific business relationship.
- For insurance products available through the Company, as an insurance intermediary, you will be asked for the information required by the insurance company to conclude your insurance policy based on the respective legal or regulatory framework governing their operation.

The collection and processing of your aforementioned personal data by the Company is necessary for the establishment, maintenance and continuation of any business relationship between us. If you object to the provision or processing of your personal data, it may be impossible to establish or continue your cooperation with the Company.

B. Processing of special categories of personal data

The Company shall not process any personal data of yours which are related to your racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union membership, genetic or biometric data, which confirm your identification as the data subject, and data concerning health or data concerning your sex life or sexual orientation, unless: a) you have given your explicit consent for a specific purpose; b) these data have been provided to the Company by you or any third party, either natural or legal person, as part of the documentation and safeguard of your and/or the Company's legitimate interests, in its capacity as the Controller; c) processing is necessary to protect your, any other individual's, vital interests; d) the data have been manifestly made public by you; e) processing is necessary for the establishment, exercise or defense of both your legal claims and the Company's, in its capacity as the controller (e.g., incapacity to perform legal acts); f) processing is necessary for reasons of substantial public interest (investigation of any persecuted act under the laws on the prevention and control of money laundering and terrorist financing). In any case, the Company has taken all necessary technical and organizational measures to securely keep and process your personal data belonging to the special categories above.

C. Children-related data

The personal data of minors shall be processed subject to the prior consent of their parents or the persons who have undertaken their parental responsibility, unless otherwise specified by law. For the purposes hereof, minors are persons who have not attained the age of 18 years.

D. Lawfulness of processing

The Company shall legally process personal data, provided that processing:

- Is necessary for servicing, supporting and monitoring your business transactions with the Company and the proper execution of any agreements between you and the Company.

- Is necessary in order for the Company to comply with any legal obligations or for the purposes of the legitimate interests pursued by the Company, which arise from your business transactions with the Company, or other legal rights of the Company.
- Is necessary for the performance of a task carried out in the public interest, in the context of the current legislative and regulatory framework.
- Is based on your prior explicit consent, if processing is not based on any of the aforementioned legal processing bases.

E. Withdrawal of consent

You have the right to withdraw your consent, whenever required, at any time without said withdrawal affecting the lawfulness of processing based on consent before its withdrawal. The withdrawal of your consent may be submitted through email at PiraeusFinancialHoldingsDPOOffice@PiraeusHoldings.gr or through mail at DPO Office Amariou Chalandriou & 11 Cheimaras str, Marousi, TK. 15125.

F. Purposes of processing

The processing of your personal data is related to:

- Servicing, supporting and monitoring your business transactions with the Company, the proper execution of any agreements between you and the Company, the examination of any requests for the provision of the Company's services, the performance of the Company's obligations, in its capacity as the controller or the processor, and the exercise of its legal and contractual rights.
- The service and your facilitation, by providing you with the ability to communicate with an authorized representative, by means of live image broadcast (video conference) and/ or online conversation (web chat) and/ or online telephone conversation (web audio), in the context of the rendering services, subject to your explicit consent.
- The conduct of any audits, as provided for by the current legislative and regulatory framework.

- The registration, recording and archiving of all types of your orders to the Company, which have been given in writing, by electronic means or by telephone, in order to conclude services and for the protection of services.
- The upgrading of the Company's services and the promotion of any services of the Company, the Piraeus Financial Holdings Group and any collaborators of the Company, subject to your prior consent.
- The execution of any requests towards the Company or the investigation of your complaints regarding any products and services offered by the Company.
- The compliance with the Company's legal obligations according to the current legislative and regulatory framework.
- The protection of the Company's legitimate interests in relation, among others, to the following: a) any legal claims of the Company which are raised before the competent judicial or extrajudicial / alternative dispute resolution bodies; b) the prevention of fraud and other criminal acts; c) the assessment and optimization of security procedures and IT systems; d) the management of the Company's operational risk; e) physical security and the protection of persons and property (e.g., video surveillance).

G. Automated decision making and profiling

The Company shall not make any decisions exclusively based on automated personal data processing procedures. However, it may legally make such decisions, including profiling, for monitoring purposes and for the prevention of fraud, at your expense or at the expense of the Company or any third party, as well as for the provision of ensured and reliable services by the Company, or if the processing is necessary for the conclusion or execution of an agreement, which shall be based on personal data received directly by you. The Company may also take such decisions, including profiling, to promote new products and services of the Company, the Piraeus Financial Holdings Group companies and the companies cooperating with the Company and always provided that your prior explicit consent has been given.

H. Processing of personal data and profiling for direct marketing purposes

After the Company has first obtained your consent, it may process your personal data in order to inform you on any products and services provided, which might interest you. For this purpose, the Company processes information regarding the Company's services you use, in order to present you products, services or offers which shall better serve your needs.

In any case, you are entitled to object to the processing of your personal data for the above purposes of direct marketing of the Company's products / services the Piraeus Financial Holdings Group companies and the companies cooperating with the Company, including any profiling, by submitting a request through email at PiraeusFinancialHoldingsDPOOffice@PiraeusHoldings.gr or through mail at DPO Office Amarousiou Chalandriou & 11 Cheimaras str, Marousi, TK. 15125.

I. Data retention period

The Company shall retain your personal data for as long as it is provided for in each case, pursuant to the current applicable legal and regulatory framework, and in any case for a period of twenty (20) years after the last calendar day of the year when your respective business relationship with the Company ended. In case any request on your cooperation with the Company is not accepted and the conclusion of the agreement is not completed, the data will be retained for a period of five (5) years. In case of litigation, any personal data related to you shall be retained by all means until the end of the litigation, even if the above period of twenty (20) years has lapsed.

J. Who are the recipients of personal data

Access to your personal data shall be awarded to the Company's business and operational units' employees, within the range of their responsibilities, as well as to the Piraeus Financial Holdings Group companies as part of the proper performance and execution of their contractual, legal and regulatory obligations, and to the respective statutory auditors of the Company and/or the Group.

The Company shall not transmit or disclose your personal data to third parties, except in case of:

- Undertakings (domestic and foreign), to which the Company has partly or wholly assigned the processing of your personal data on its behalf, and which have assumed a confidentiality obligation towards the Company either (a) as part of the contractual relations between them, determining the subject, purpose, and duration of processing, the nature of personal data processed and the rights of the Company; or
b) as part of their regulatory obligations to respect the principle of confidentiality, such as:
 - i. Credit Institutions, Payment Institutions.

- ii. Associated undertakings, such as: Investment societies anonyms (AEPEYs), Mutual Fund Management Companies (AEDAKs), other financial organizations or bodies or any other Authorities (e.g., Central Securities Depository, Stock Exchanges, Capital Market Commission) in order to service your business relations regarding the provision of investment services.
 - iii. Transmission of data which is imperative for the institution of a business relationship or the execution of an agreement, or for the recovery of the Company's claims in case of failure to comply with any obligations you assumed by means of an agreement you have concluded with the Company (e.g. transmission to cooperating lawyers, law firms, notaries and court bailiffs).
 - iv. Companies engaged in the digitization and management (storage, destruction) of physical files.
 - v. Companies issuing and dispatching letters
 - vi. Companies engaged in the submission of property rights statements of the Company in regions which have been or shall be included in the National Cadastre.
 - vii. Companies cooperating with the Company for the participation in loyalty programs or for the promotion of the Company's products and services.
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- Undertakings / companies affiliated to the Company, within the meaning of Article 32 and Annex A of Law no. 4308/2014.
 - Any transmission or disclosure, as required by the current statutory, legal and regulatory framework in general or a court judgment (transmission to judicial authorities, tax authorities, supervisory bodies, intermediaries).
 - Judicial and Public authorities within the exercise of their duties.
 - The Bank of Greece, the other national central Banks of the Eurosystem and the European Central Bank or any other supervisory or audit bodies within their legal duties.
 - Real estate management companies, which operate legally and operate in accordance with applicable law.
 - Companies providing virtual data room services in order to support and facilitate the management of trade relations carried out to serve legitimate processing purposes, in accordance with applicable law.

- Companies providing Cloud services.

The Company has lawfully ensured that any processors acting on its behalf shall meet all requirements and provide sufficient assurance regarding the implementation of the appropriate technical and organizational measures, so that the processing of your personal data occurs in a way that the protection of your data is ensured.

The Company shall not directly transmit your personal data to third countries or international organizations, unless said transmission is required pursuant to the current regulatory or legislative framework or if it is strictly necessary for the fulfillment of other lawful processing purposes and always under the condition that it is based on valid legal processing bases, the provided conditions are met and an adequate level of protection is ensured, in accordance with the provisions of the GDPR

K. Data subject rights

As personal data subject, you have the following rights:

1. Right of access to the personal data concerning you, provided that they are being processed by the Company, in its capacity as the controller, to the purposes of said processing, the categories of data and the recipients or categories of recipients (Article 15 GDPR).
2. Right to rectify inaccurate data and complete incomplete data (Article 16 GDPR).
3. Right to erase your personal data subject to the Company's obligations and legal rights to retain them, pursuant to the current applicable laws and regulations (Article 17 GDPR).
4. Right to restrict the processing of your personal data if either the accuracy of said data is contested or the processing is unlawful or the purpose of the processing was eliminated, and provided that there is no legitimate reason to retain them (Article 18 GDPR).
5. Right to the portability of your personal data to another controller, provided that the processing is based on your consent and is carried out by automated means. This right

shall be exercised subject to the Company's legal rights and obligations to retain the data and to perform a task which is carried out in the public interest (Article 20 GDPR).

6. Right to object on grounds relating to your particular situation, in case your personal data is processed to perform a task carried out for reasons of public interest or in the exercise of official authority vested in the Company or for the purpose of legitimate interests which are pursued by the Company or any third party.

L. How to exercise your rights and submit complaints

All requests regarding your personal data and the exercise of your rights shall be dispatched in writing to: "Piraeus Financial Holdings, Data Protection Office (DPO)" and shall be sent either to email address PiraeusFinancialHoldingsDPOOffice@PiraeusHoldings.gr or delivered to mail address Amarousiou Chalandriou & 11 Cheimaras str, Marousi, TK. 15125.

Any refusal of the Company or any unjustified delay in responding to your requests following the exercise of your rights, shall give you the right to recourse to the Hellenic Data Protection Authority as the competent supervisor for the application of the GDPR.

In any case, you reserve the right to submit a complaint to the competent supervisory authority, if you consider that your personal data processing infringes the current applicable legislation. For more information please visit www.dpa.gr.

Please be advised that the Company uses "cookies" on its website in order to improve your online experience. For more details on cookies, you may be informed by the Company's Terms of Use which are available at www.piraeusholdings.gr.

Based on the respective applicable policy on data protection and in the context of the current legislative and regulatory framework, the Company may review or amend this update, which shall always be up to date and available on the Company's website www.piraeusholdings.gr.