



## BRIEFING ON THE TERMS AND CONDITIONS OF THE PROCESSING OF THE PERSONAL DATA OF PIRAEUS BANK'S HUMAN RESOURCES

We communicate with you in order to inform you in respect with the way that Piraeus Bank processes your personal data and in order to assure you that our primary concern is to safeguard your personal data both within the framework of the Bank's key principles for the protection of your fundamental rights, and more specifically under the context of the new Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as the "General Data Protection Regulation" or "GDPR") and the current legislative and regulatory framework.

This letter concerns all employees of the Bank's human resources, regardless of the form of employment and the specific legal basis of the contract you have concluded, for example a fixed-term or indefinite-term employment contract, a pay-order contract, a contract for the provision of independent services (natural person), etc. (hereinafter referred to as "Contract"), and is intended to inform you in a simple, clear and intelligible manner about the terms and conditions of the processing of the personal data concerning you as an employee of the Bank ("the Human Resources" and / or "Employee").

So please proceed in reading it carefully.

The Bank, as Data Controller, processes your personal data exactly because you are employed by the Bank and assures you that the processing is always for legitimate and fair purposes in order to protect the dignity of your legitimate interests and fundamental rights, respecting the principles of fair and transparent processing and the current legislative framework.

### **(1) Processing:**

First of all, it is important to clarify what is defined as processing by the Bank (hereinafter referred to as "Processing"). It is any operation or set of operations which is performed with or without the use of automated means on your personal data (and, as appropriate, as will be explained below, your relatives) that are necessary for the execution and for the servicing of purposes derived from the Contract, in order to protect your rights under the context of the Contract and, in general, the labor and insurance legislation, as well as of the legitimate interests of the Bank in accordance with the current legislative and regulatory framework. The Processing is conducted from the preparatory stage (e.g. when you send your CV to apply for job offering), at the initiation as well as throughout the whole duration of the Contract, but also after any termination of the Contract in any way, denunciation and its discontinuance in general.

Processing of personal data refers to any action that takes place and concerns your personal data, from the initial collection to the final deletion and / or destruction, and includes, but is not limited to, registration, organization, storage, alteration, retrieval, search of information, use, transmission, dissemination or distribution, association, restriction, etc.

The Bank, in terms of the processing of the personal data of the Employees, is represented by the Data Protection Officer (DPO), the Personal Data Protection Office of the Bank, at [PiraeusBankDPOOffice@piraeusbank.gr](mailto:PiraeusBankDPOOffice@piraeusbank.gr).



## **(2) Processing purposes:**

The purposes of the processing of the personal data of the Bank's Human Resources are always based on valid legal basis that justify the legitimacy and necessity of such processing and concern both yours and the Bank's rights protection.

Thus, the Bank processes your data for:

- Performing and fulfilling the purposes of the Contract, serving, supporting and monitoring the contractual relationship that links you with the Bank and providing all means and facilities for the smooth operation, development and upgrade of this contractual relationship. In this context, decisions concerning you as an individual can be taken, based on automated processing, including profiling (e.g. decisions to participate in development programs, meet internal staffing needs, etc.).
- Exercise, on an individual or collective basis, of your rights, the granting of benefits related to your employment, the satisfaction of all your requests, the high level provision of benefits and the creation of appropriate working conditions for the Bank's Human Resources.
- Safeguarding, defending and protecting your interests.

Simply put, the Bank processes your personal data to pay your earnings and other benefits, for your insurance to a public body, for your joining to a private group insurance contract, for your integration into training programs, etc.

It also processes your data:

- To fulfill its obligations under the Contract and the applicable legal and regulatory framework, both at the initiation and throughout the duration of the above-mentioned contractual relationship that links you with the Bank, but also after any termination of Contract in any way, denunciation and its discontinuance in general (e.g. for withholding and paying taxes and insurance contributions, payment of damages, etc.).
- To defend the legitimate interests of the Bank in the exercise of its activities and to achieve the objectives of proper management, planning and organization of the employment framework, ensuring equality and diversity in your workplace, health and safety, protecting the property of the Bank and its clients (e.g. for the security of persons and buildings).
- For servicing needs and / or implementing policies and procedures related to Human Resources (e.g. implementation of policies regarding promotions, reward programs, movements, organizational needs or changes, etc.).

## **(3) Personal Data / Categories of Personal Data:**

Your personal data collected and processed by the Bank are highly indispensable, appropriate, relevant, pertinent, limited to what is necessary and are intended to serve and fulfill these purposes of processing, the Bank's compliance with its obligations, in accordance with the applicable legal and regulatory framework, as appropriate, safeguarding and serving the public interest, as well as pursuing yours and the Bank's legitimate interests arising from the Contract and the applicable law.

Personal data are collected by completing the necessary forms during the preparation as well as during the signing of the Contract and generally all the required documents related to your contractual relationship with the Bank and any other relevant action (e.g. when participating in voluntary actions).

Indicatively, we list the main categories of Personal Data related to you that are processed by the Bank:



**(A)** Identification data, which are least necessary for the execution and service of the Contract, for the Bank's compliance with its legal obligations and for the protection of its legitimate interests.

**(i)** Your full name and contact details.

This category includes, indicatively, the following: Full name, father's name, mother's name, home address, e-mail address, telephone (fixed, mobile), spouse and dependent children's full name, etc.

**(ii)** Other identification data.

This category includes, indicatively, the following: Identity card number or other relevant identification document (e.g. passport), Tax Identification / Registration Number (TIN), Social Security Number (SSN) of yours and yours' protected family members, birth certificate of yours and your protected members, family status certificate, etc.

**(B)** Other personal data necessary to perform and serve the terms and purposes of the Contract, to fulfill the Bank's obligations, to protect the legitimate interests of yours and the Bank, for the management, planning, organization of the employment framework, safeguarding your health and safety.

This category includes, but is not limited to:

**(i)** Personal data relating to your education and training, such as Curriculum Vitae, high school diploma, high school, university degree, postgraduate degree, doctorate, foreign language diploma, certificate of attendance at seminars, conferences, educational programs, etc.

**(ii)** Personal data related to certifications and other professional licenses, such as a license to practice a profession, a document certifying the acquisition of specialized knowledge in a subject related to the Bank's activities and / or the specific role (e.g. insurance mediation, investment services, etc.).

**(iii)** Evaluation Reports in the context of the execution of the Contract.

**(iv)** Information regarding your employment history: data, documents and generally past service historical data, past employers, years of previous employment, previous field of employment, etc.

**(v)** Wages - Benefits such as payroll status, status of paid benefits, etc.

**(vi)** Information related to actions that violate principles, policies of the Bank, and the Code of Conduct & Ethics and generally the regulations governing the operation of the Bank and any disciplinary action imposed on you by the competent bodies of the Bank in accordance with the procedures and policies of the Bank, etc. and are required to safeguard the employment framework.

**(vii)** Your photo, in physical and / or electronic, digitized and non-editable form, provided it meets specifications set by the Bank and are described in detail in its procedures.

In particular, your photo is necessary, indicative, in the following cases:

- For completing the physical file, to enhance your authentication tools.
- It is posted to the Bank's Human Resources Management System (HRMS). This makes it easier to be identified, to be recognized by your supervisors who, in the exercise of their duties and responsibilities, have access to your HRMS profile and are responsible for your evaluation. This is especially useful in cases where your supervisor has a large number of Employees in his charge.



- For security reasons of persons and buildings, it is included in the bank's entry card (winners card).
- It is enclosed in your health booklet or other healthcare related documents, in accordance to the requirements of applicable law.

**(viii)** Data relating to your health, such as recruitment check-ups, medical certificates, medical certificates that concern you, etc. which, in any case, must be presented in a closed envelope and transmitted to the competent working doctors of the Bank, to doctors of competent insurers, etc. This processing is performed for the purposes of health and safety, prevention, control of communicable diseases and other serious health threats, and in any case for the protection of your interests and the Bank's compliance with its obligations by the Contract and applicable law.

**(ix)** Criminal Records Certificates, due to the specific nature of the Bank's activities.

**(x)** Data relating to your trade union activity and other relevant information to safeguard the exercise of your trade union rights, in accordance with applicable law.

**(xi)** Personal data of yours, your spouses and your minor children in the context of the participation of your minor children in the Piraeus Bank Group's children's camp "Φυλλαράκια" or in any other camp of the Bank or in the context of the participation in voluntary activities of the Bank or in various events and for the purpose of participating in these activities.

#### **(4) Recipients of Personal Data:**

The access to your personal data within the Bank is restricted to authorized employees who have been appointed by the Bank under the context of their role and their responsibilities and in the performance of their duties and tasks assigned to them and in the context of cooperation, service needs, organizational changes etc.

The Bank does not proceed to transmit, share or disclose such personal data except for:

- Companies belonging to the Bank Group in the exercise of their responsibilities.
- Competent administrative, judicial, government bodies, in the exercise of their legal duties and responsibilities.
- The Bank of Greece, the other European system national central banks, the European Central Bank and any competent supervisory authority in the exercise of their duties and responsibilities.
- External partners and / or consultants under a specific partnership, based on a written contract that always ensures that your personal data are preserved.

The Bank ensures that anyone processing personal data on its behalf, according to the aforementioned, complies with all the conditions and provides sufficient guarantees to implement appropriate technical and organizational measures in such a manner that processing will meet the requirements of the applicable legal and regulatory framework and ensure the protection of your rights with respect to the processing of your personal data.

Finally, transmission or disclosure may also take place in any other case that may be required in the execution and servicing of the purposes of the Contract and in fulfilling the obligations arising from the Contract and the current legislative and regulatory framework.



The Bank does not transfer personal data cross-border unless an adequate level of protection is ensured.

#### **(5) Retaining Personal Data:**

Personal data are stored in a physical, electronic or other appropriate form and are maintained by the Bank throughout the duration of the Contract, but also for as long as it is appropriate for the achievement of the purpose of processing, in accordance with the requirements of the current legislative and regulatory framework. In any case, personal data shall be retained for a maximum period of twenty (20) years from the last calendar day of the year in which any termination of the Contract in any way, denunciation and its discontinuance in general occurred, unless a shorter time retention period is provided (e.g. data collected in the context of participation in camp activities, voluntary activities, various events, etc.). If you wish for the Bank to keep your personal data indefinitely for your future needs (e.g. a 20-year post-employment certificate, etc.), you can express your explicit consent in a formal and written manner.

In the event of litigation, personal data will be retained until the end of the lis pendens and the issuance of an irrevocable court order or the expiry of the required time-limits, even if the above-mentioned twenty (20) years maximum is exceeded.

#### **(6) Rights of the Subject of Personal Data:**

Your rights with respect to your personal data and in accordance with the specific provisions of the GDPR and the legislation in force are as follows:

**(a) The right of access** under which you have the right to obtain from the Bank information about which personal data is processed, receive copies thereof, etc.

**(b) The right to rectification**, in order to rectify any incomplete or inaccurate data (e.g. change your address or telephone number).

**(c) The right to erasure ('right to be forgotten')**, whereby you may ask for your personal data to be erased when there is no longer any valid ground for their processing.

**(d) The right to restriction of processing** by which you may request that the processing of your personal data is limited, i.e. used only in specific cases, and especially if it is not accurate, if it has been unlawfully processed but you do not want them to be erased, if they are no longer needed for the specified processing purposes but you want to be retained for potential future claims, if you have asked the Bank to stop processing and expecting notification whether there are still legitimate grounds for their processing.

**(e) The right to data portability**, by which you can ask for data to be provided to you in a structured, commonly used and machine-readable format, or ask them to be transmitted to an organisation of your indication.

**(f) The right to object and oppose processing** when the processing is based on the legitimate interest but there is some particularity in your situation and you therefore want to oppose to the processing. If you exercise this right, the Bank will no longer process your personal data unless it can demonstrate compelling and legitimate grounds for the processing.

You may, in addition, oppose a Bank decision taken solely on the basis of automated processing, including profiling, if it produces legal effects concerning you or significantly affect you in a similar way, unless special reasons exist under applicable law.



**(g)** If the processing is based on your consent, you may revoke it at any time, but it is clarified that the lawfulness of the processing made prior to the withdrawal of your consent is not prejudiced.

**(h) The right to file a complaint** by which, if you have exercised some or all of your above mentioned rights but you are still concerned about the way the Bank processes your data or you believe that you have not been satisfied with the Bank's replies, you may submit a complaint to the competent authority.

In order to exercise your rights, you can contact the Group Human Resources (GroupHR@piraeusbank.gr) but also in writing to the Data Protection Office (Data Protection Officer - DPO) at PiraeusBankDPOoffice@piraeusbank.gr .

#### **(7) Personal data security controls**

The Bank has incorporated into its systems, policies and internal procedures all technical and organizational measures designed to ensure the legitimacy, objectivity of the processing of your personal data, fairness and transparency, the limitation of the purpose of such processing , the minimization of such personal data, the accuracy, the limitation of the storage period of those personal data, integrity and confidentiality, and is in full compliance with all the principles that should govern the processing of personal data of the Bank's Human Resources in accordance with the provisions of the GDPR. At the same time, it applies the appropriate technical and organizational security measures to its systems and procedures to protect the confidentiality, integrity and availability of your personal data.

With respect for your fundamental rights, the Bank ensures the protection of your personal data concerning accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access and, in general, any other form of illicit processing.

#### **(8) Changes to this form**

This update will also be posted on the internal information networks (Intranet, HR Portal).

As this privacy statement or the way of processing of your personal data may be amended in the future, in order to be informed of all changes, the revised statement will be always posted on internal communication networks and the date of the review will be noted.