



**PIRAEUS BANK SA**

**ANNUAL GENERAL MEETING OF SHAREHOLDERS**

**JUNE 26<sup>th</sup> 2020**

**DATA PRIVACY NOTICE – SHAREHOLDERS**



## **(A) INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE SHAREHOLDERS OF PIRAEUS BANK**

The societe anonyme under the name “**Piraeus Bank Societe Anonyme**” which has its registered head office in Athens (4 Amerikis Str.). VAT No.: 094014298, Tax Office : Athens Tax Office for Commercial Companies (FAE), General Commercial Registry (GEMI) No.: 225501000 (hereinafter referred to as the “Bank”), in its capacity as the controller of personal data in the context and in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as “General Data Protection Regulation” or “GDPR”), the Law 4624/2019 and in general according to currently applicable legislation in force with regard to the protection of personal data, shall hereby provide the following update on the processing necessary of the personal data of the natural persons who are or were registered shareholders of the Bank, of those who have the capacity of the shareholder of the Bank, of their representatives as well as of the pledged creditors of the shares, anyone who has voting right over the shares, and in general derives or/and exercises rights over the shares of the Bank, their representatives, of those who exercise the voting right by representing legal entities as well as of those who participate, under any capacity, to the General Shareholders Meetings of the Bank (hereinafter, for the purposes of the present, all the above categories of natural persons will be jointly referred to as “Shareholders” and each of them as “Shareholder”).

It shall be noted that processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The Bank, as the issuer of the shares, legally processes the personal data of the Shareholders, i.e. of the above natural persons, under the aforementioned capacities, always for legitimate and fair purposes, following the principles of the fair and transparent processing, applying the appropriate technical and organizational measures, in compliance with the requirements of the GDPR as well as the current legal framework, always having as a guide and primary concern the safeguarding and protection of personal data and the fundamental rights of data subjects.

Following the above, the Bank, in compliance with the principle of transparency, is currently informing the Shareholders about the terms of processing of personal data concerning them.

### **(I) Which personal data the Bank processes and where it collects them from**

The personal data of the Shareholders which are collected and processed by the Bank in the context of the operation and service of the shareholder capacity and in order to carry out the tasks required under the shareholder relationship are the most necessary, adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.



Indicatively the main categories of personal data concerning the Shareholders and which the Bank processes for legitimate purposes of processing, are the following:

- (a) Identification data and identity documents, such as name and surname, father's name, spouse's name, date of birth, number and copy of identity card or passport or other equivalent document, tax identification number (A.F.M.), competent Tax Authority (D.O.Y.), country of tax residence, any special tax treatment, profession/activity, citizenship and other demographic data.
- (b) Contact information such as postal and e-mail address (email), fixed and mobile telephone number.
- (c) Bank account number.
- (d) Number and type of shares.
- (e) Investor Record Code Number in the Dematerialized Securities System (DSS), Securities Account with the Dematerialized Securities System (DSS), Number of Shareholder's Registry.
- (f) Correspondence and communication data.
- (g) Data relating to the capacity under which the Shareholder participates to the General Meeting of the Bank and the relevant supporting documentation, details of the shares and of any rights they hold on such shares, information regarding any trading activity of shares.
- (h) Data relating to the participation and the exercise of the voting right of the Shareholder in the General Meeting of the Bank, information regarding any requests addressed to the Bank, signature of the Shareholders and in general any information in the context of implementing the current rules on financial instruments markets.

The above personal data are collected either directly from the Shareholders for the performance of tasks concerning them – who shall take care for the update of their personal information, so that the Shareholders' Registry remains update up-to-date and accurate – either from third persons authorized by the Shareholders, either from the society anonyme under the name "Hellenic Central Securities Depository S.A.", which, at its capacity as operator of the Dematerialized Securities System (DSS), keeps the details of identification of the Shareholders as well as other information related to the Bank's shareholder structure, any transactions on the shares and are provided to the Bank through electronic records, according to the provisions of the legislation in force and the Regulation of the Dematerialized Securities System (DSS).

## **(II) Which are the purposes of processing of personal data**

The Bank collects the personal data of the Shareholders, as above mentioned, and in general processes them, for the fulfillment of legitimate purposes of processing and always according to valid legal basis which establish the lawfulness of the processing.

Specifically, the Bank processes the personal data of the Shareholders in order:

- (a) To identify the Shareholder.



(b) To communicate with the Shareholder.

(c) To verify the possibility and legality of exercising Shareholders' rights, according to the relative legislation and moreover to facilitate the Shareholders to exercise their rights, according to the law (indicatively exercise of the right of participation and voting right and in general exercise of the rights of the Shareholders in the General Meetings, shareholder confirmation, drawing up a shareholders' list, keeping minutes of the General Meeting, participation to corporate actions, dividend distribution).

(d) To facilitate the settlement of corporate actions (e.g. dividend distribution, share capital increase etc), to disclose transactions of liable individuals to the Athens Stock Exchange, to monitor transactions on the Bank's shares.

(e) To perform the Bank's contractual obligations towards the Shareholders (i.e. dividend distribution) and in general to fulfill the Bank's obligations towards the Shareholders.

(f) To comply with legal obligations.

(g) To fulfill and support legal rights, to protect and service the legitimate interests of the Bank (such as in case of legal claims of the Bank), except where such interests are overridden by the interests or fundamental rights and freedoms of the data subjects which require protection of personal data.

(h) To fulfill the obligations arising from provisions of tax legislation and other compulsory provisions.

(i) To manage and maintain the Shareholder Register, in accordance with the applicable legal provisions.

(j) To perform over the counter transfers of the shares.

(k) To publish acts and information of the Bank in the General Commercial Registry (G.E.M.I.), the Athens Stock Exchange or on the website of the Bank, as required by law.

(l) To respond to requests of the Shareholders, carry out requests of the Shareholders in connection with the services provided by the Bank (e.g. issuance of certificates), to provide replies and clarifications to specific inquiries or requests addressed to the Bank by the Shareholders.

(m) To keep an archive of the Bank's shareholders.

### **(III) Who are the recipients of personal data**

Access to the personal data of the Shareholders shall be awarded only to the Bank's employees, within the range of their responsibilities and in the exercise of the duties assigned to them and specifically those who are responsible for Shareholders' identification and for reviewing the lawful exercise of their rights.

The Bank shall not transmit or disclose the personal data of the Shareholders except in case to:

(a) Natural persons and legal entities, to which the Bank assigns the execution of certain tasks on its behalf, such as, inter alia, to providers of technical and support services, database management companies, file storage and recordkeeping companies, postal services providers, providers of services related to the development, maintenance



and customization of IT applications, e-mail services providers, companies providing webhosting services (including cloud services), in general to providers of services, to lawyers, law firms, accountants, chartered accountants or audit firms, to external advisers and collaborators of the Bank.

(b) The society anonyme under the name “Hellenic Central Securities Depository S.A.”.

(c) Supervisory, audit, tax, independent, judicial, police, public and/or other authorities and bodies within the scope of their statutory tasks, duties and powers (indicatively Bank of Greece, European Central Bank, Hellenic Capital Market Commission, Athens Stock Exchange, Hellenic Central Security Depository, Anti-Money Laundering Authority, Deposits and Loans Funds, General Commercial Registry).

(d) Other Shareholders of the Bank, as appropriate, in accordance with the law.

(e) Other companies which belong to the Group of the Bank.

The Bank has lawfully ensured that any processors of personal data, acting on its behalf, according to the above mentioned, shall meet all requirements and provide sufficient guarantees to implement appropriate technical and organizational measures in such a manner that such processing will meet the requirements of the GDPR and in general of the applicable legislative and regulatory framework and ensure the protection of the rights of the data subjects.

In case that transfer of personal data to third countries (i.e. to countries outside the European Economic Area (EEA) or international organizations is required, such transfer and in general processing shall be subject to compliance with the GDPR and in general the legislative framework with regard to the protection of personal data and only under the condition that requirements shall be met and the provisions of GDPR shall be applied, in order to ensure that the level of protection of natural persons guaranteed by GDPR is not undermined and that sufficient safeguards are provided for the protection of personal data.

#### **(IV) Data retention period**

The retention period of Shareholders’ personal data by the Bank, in the context of the shareholder capacity, is determined for the whole duration of the Bank and in accordance with the applicable regulatory framework as in force.

The personal data will be stored/kept by the Bank for the period of time determined by law and in general required by the legal and/or regulatory framework in force or is required for the purposes of legitimate interests of the Bank, for the exercise of claims and for the defense of the Bank in case of litigation, for the pursuit of claims of the Bank as well as for the performance of contractual obligations and in general in accordance with the respective the legal basis and the purpose of their processing.

#### **(V) Measures of protection and security of personal data**

The Bank has incorporated into its systems, policies and internal procedures all the technical and organizational measures aimed at ensuring the lawfulness, objectivity of processing transparency, limitation of purpose, minimization, accuracy, storage limitation, integrity and confidentiality and is in full compliance with all principles



relating to the processing of Shareholders' personal data, in accordance with the provisions of the GDPR and the applicable legal framework. At the same time, the Bank implements the appropriate technical and organizational security measures in its systems and procedures, with the aim of protecting the confidentiality, integrity and availability of personal data as well as protecting personal data against unauthorized or unlawful processing, accidental loss, destruction or damage, alteration, prohibited dissemination or access and in general any other form of unfair processing.

#### **(VI) Data subjects' rights**

The Shareholder, as data subject, has the following rights, according to GDPR, which may be exercised on case by case basis:

(a) **Right of access** to the personal data concerning the Shareholder, and specifically to know which personal data concerning him/her, are kept and processed by the Bank, their source as well as the purposes of the processing, the categories of the personal data, the recipients or categories of recipients (article 15 of GDPR).

(b) **Right to rectification** of inaccurate personal data as well as supplementation of personal data, in order to be complete and accurate, by submitting any necessary document which shows the need for supplementation or rectification (article 16 of GDPR).

(c) **Right to erasure (right to be forgotten)** of the personal data, when inter alia, there is no longer valid purpose of processing, subject to the Bank's obligations and legal rights to retain them, pursuant to the current applicable laws and regulations (article 17 of GDPR).

(d) **Right to restriction of processing**, if either the accuracy of the personal 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 of GDPR).

(e) **Right to data portability** of the personal data, by virtue of which the Shareholder has the right to receive the personal data concerning him or her, which he or she has provided to the Bank, in a structured, commonly used and machine-readable format or has the right to ask to transmit those data to another controller, provided that the processing is based on consent and is carried out by automated means and subject to the Bank's legal rights and obligations to retain the personal data (article 20 of GDPR).

(f) **Right to object** the processing of personal data concerning him or her on grounds relating to the particular situation of the Shareholder in case the processing is carried out for the purposes of the legitimate interests pursued by the Bank or by any third party or in order to perform a task carried out for reasons of public interest or in the exercise of official authority vested in the Bank (article 21 of GDPR).

Furthermore, the Shareholder, as data subject, has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her, unless special reasons occur according to the legislation in force.



(g) In case the processing is based on previous explicit consent of the Shareholder, the Shareholder has the right to withdraw the consent at any time, without said withdrawal affecting the lawfulness of processing based on consent before its withdrawal.

(h) **Right to file a complaint with the competent authority**, by which the Shareholder has the right to submit – file a complaint with the Hellenic Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)), which is the competent supervisory authority for the protection of the fundamental rights and freedoms of natural persons with regard to their personal data processing, when he/she assumes that his/her rights are infringed in any way and that the processing infringes the current applicable legislation as well as the right to initiate judicial proceedings.

Furthermore it shall be noted that the Bank has, in any case, the right to refuse the satisfaction of Shareholder's request if, indicatively, the personal data processing is necessary for the retention of the capacity as shareholder and/or the possession of his/her voting right, for the exercise of his/her rights as the Bank's Shareholder or as person having voting right, as well as in case they are necessary for the establishment, exercise or defense of the Bank's legal rights, the compliance of the Bank with its legal obligations or the fulfillment of the Bank's obligations towards the Shareholders.

The Bank reserves in any case the right to deny the deletion of Shareholder's personal data if such personal data is essential for the purposes of maintaining the archive of the Bank's Shareholders, as well as in any case the processing or retention is necessary for the establishment, the exercise and the defense of the Bank's legal rights or the fulfillment of the Bank's obligations.

The exercise of the right to data portability does not imply the deletion of data from the Bank's records.

#### **(VII) How to exercise the right of the data subjects**

All requests of the Shareholders regarding personal data concerning them and processed by the Bank and the exercise of their rights shall be dispatched in writing to: "Piraeus Bank S.A., Data Protection Office (DPO Office)" and shall be sent either to the email address [PiraeusBankDPOOffice@piraeusbank.gr](mailto:PiraeusBankDPOOffice@piraeusbank.gr) or delivered to any branch of the Bank. The full details of the Data Protection Officer (DPO) are posted on the Bank's website ([www.piraeusbank.gr](http://www.piraeusbank.gr)), in the section Useful Information of the Clients > General Data Protection Regulation (GDPR). A special form for the exercise of the right of access shall be available at all branches of the Bank.

Any refusal of the Bank or any unjustified delay in responding to the requests of the Shareholders, following the exercise of the Shareholders' rights, shall give them the right to recourse to the Hellenic Data Protection Authority, as the competent supervisory authority for the application of the GDPR, according to the above mentioned.

Based on the respective applicable policy on data protection and in the context of the current legislative and regulatory framework, the Bank may review or amend this update, which shall always be up to date and available on <https://www.piraeusbankgroup.com/en/investors/corporate-governance/general-meetings>.



## **(B) SUPPLEMENTARY INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE SHAREHOLDERS OF PIRAEUS BANK AND OTHER PARTICIPANTS TO REMOTE SHAREHOLDERS MEETINGS OF PIRAEUS BANK**

The Bank, under its capacity as controller of personal data and additionally to the above under (A) Information on the processing of personal data of the Shareholders of Piraeus Bank, hereby notifies the Shareholders that, for reasons of participation to the remote Annual General Meeting of the Shareholders of the Bank, which shall take place on Friday, June 26th, 2020 and at 10.00 a.m. or any adjournment or repetitive meeting thereof and which will take place remotely, in real-time, by teleconference and the use of electronic means - taking into account the measures and instructions of the State against the risks and spread of COVID-19 and in accordance with the provisions in the current Articles of Association of the Bank and under the conditions of the current legislation – and for the reasons of participation in the future to any other remote Annual General Meeting of the Bank, remote Annual General Meeting of the Bank or any remote Repetitive General Meetings of the Bank and in general for reasons of participation to any remote General Meeting of the Bank (hereinafter referred to as “General Meeting”), will be collected and processed either by the Bank either by the societe anonyme under the name “Hellenic Central Securities Depository S.A.”, processor on behalf of the Bank, to which the Bank has assigned the organization of any remote General Meeting, either by anyone else processor on behalf of the Bank, to which the Bank assigns the organization of any remote General Meeting, the codes of process of the Shareholders in the online platform [www.athexgroup.gr/AXIAeShareholdersMeeting](http://www.athexgroup.gr/AXIAeShareholdersMeeting), through which they will have the possibility to participate and vote remotely in the General Meeting (hereinafter referred to as the “Online Platform”).

Furthermore, the Bank informs the Shareholders that, according to article 131 (way of voting in the General Meeting) par. 2 of Law 4548/2018, the remote voting is obvious and the exercise of the right to vote by the Shareholder and the content of his/her vote, if requested, may be communicated to the other participants in the General Meeting, Shareholders.

In addition, the Bank, through this supplementary information, informs, in the capacity of the controller, in accordance with the GDPR, the Law 4624/2019 and the other provisions on the protection of personal data, the natural persons other than the Shareholders, who will participate in teleconference (video conference) of the remote General Meeting, such as Members of the Board of Directors of the Bank, executives of the Bank, auditors and other third parties, that it processes the following personal data, which are collected directly by the data subjects in question, for the purposes of the legitimate interests pursued by the Bank for that processing:

- (a) Identification data, such as name, surname, father’s name, identity card, passport or other equivalent document.
- (b) Data relating to the capacity under which such persons are entitled to participate to the General Meeting.
- (c) E-mail address (email), mobile telephone number, in order for the natural person to participate to the teleconference.
- (d) Data image - sound (video) from the participation of the natural person to the General Meeting.





Recipients of this data are the executives responsible for the management of the General Meeting of the Bank, the societe anonyme under the name "Hellenic Central Securities Depository S.A." to which the Bank has assigned, as the processor on behalf of the Bank, the organization of the remote General Meeting as well as any sub-processors (further processors) the processing for the societe anonyme under the name "Hellenic Central Securities Depository A.E." (such as the company Cisco Hellas S.A., which provides the WEBEX tool / services team with which video conference is provided through cloud services) which is maintained within the European Economic Area (E.O.X.), as well as anyone else who performs the processing (processor) on behalf of the Bank, to which the Bank entrusts the organization of any remote General Meeting as well as any sub-processor (further processor) the processing for the above processors.

The above personal data are kept by the Bank for the period required by law and in general in accordance with the applicable legal and / or regulatory framework or for the exercise of claims or the defense of the legitimate interests of the Bank and in general in accordance with the respective legal basis for the retention of personal data based on the purpose that their processing serves.

In other respects, with regard to the rights of the above data subjects, in accordance with the GDPR, as well as to the exercise of these rights by the subjects, but also in general with respect to all other, than the above, terms relating to the processing of personal data of the above data subjects, all that is mentioned in the above under (A) Information on the processing of personal data of the Shareholders of Piraeus Bank, shall apply.

It is further noted that in the context of the remote General Meetings of the Bank, the necessary teleconference is carried out by using platforms that support security services, ensuring that the link of the planned teleconference is adequately protected and in general careful study of the terms of use and terms of protection of personal data precedes the selection of the teleconference solution, in full compliance with the GDPR, the Law 4624/2019 and in general the current legislation on personal data protection.