

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO THE REGULATION (EU) 2016/679 AND THE RELEVANT GREEK LEGISLATION**

Eurobank Equities Investment Firm S.A. (hereinafter referred to as the “Company”) informs you, pursuant to the Regulation (EU) 2016/679 and the relevant Greek legislation in force with regard to the protection of personal data, in its capacity as Data Controller, that it processes your personal data, collected either with the submission of an application for the provision of a product or a service, or at a later time, including data derived from the signing and the performance of a contract(s) with the Company, or in the framework of relations and transactions with the Company, as set out below.

### **1. What personal data does the Company collect and from which source?**

- a) Identification data: name, father’s name, Identity Card Number, Tax Identification Number, date of birth, sex etc. The aforementioned data are collected directly from you and/or from publicly accessible sources.
- b) Contact information: postal and e-mail address, fixed and mobile telephone number etc. The data are collected directly from you and/or from publicly accessible sources etc.
- c) Data concerning your economic and financial situation, your profession, remuneration etc. The said data are collected either directly from you /at your request, or from publicly accessible sources.
- d) Data related to the performance of your contract(s) with the Company and the use of the products or services provided to you.
- e) Data related to recorded communications (phone calls, face to face communication, electronic communication) provided you have been previously informed, in compliance with the law.
- f) Data related to the use of electronic and/or virtual products and services of the Company (such as cookie identifiers, IP addresses, location data or other online identification data), pursuant to the specific terms governing these products and services.
- j) Image data collected from the video recording systems of the premises of the Company, within which signs have been placed pursuant to the law.
- i) Data related to payments and the provision of payment services, which are collected either from you or from the provider of payment services that you have chosen.
- k) Data concerning your knowledge and experience in the investment sector with regard to a specific type of product or service, your financial situation, including your ability to bear losses, your tolerance level towards risk and your investment objectives and needs. The abovementioned data are collected directly from you, depending on the investment service or the relevant investment product.

The data collection from you encompasses the data collection from a third party acting on your behalf as well as the data collection from a Company’s client or potential client associated with you (natural or legal person). In case you provide us with personal data of third parties you must have ensured their consent and have referred

them to this Data Protection Information.

## **2. Why does the Company collect your data and for which purposes?**

The Company collects and processes your personal data:

### **A. For the execution of a contract and in order to carry out pre-contractual measures upon your request**

The processing of your data as described in Section 1 serves indicatively the following purposes:

- a) Your identification and the communication with you during your pre-contractual and contractual relation with the Company, as well as during any other transaction between you and the Company.
- b) The signing of a contract (investment or other ancillary services etc.) with you, the execution and smooth functioning of said contract and the fulfilment of the Company's obligations towards you.
- c) The assessment of the suitability and compatibility of said investment, your information, the governance of investment products and your admission, where possible, to the identified target-market of these products.
- d) In case of granting any credit for buying shares your data will be processed for:
  - i. the assessment of the credit risk to which the Company will be or has already been exposed;
  - ii. the monitoring of the evolution of the debt;
  - iii. the prevention or mitigation of the possibility of a failure by your part to fulfill your obligations arising from your contract(s) with the Company;
  - iv. the pursuing of the collection of any possible sums owed to the Company due to the performance of your contract(s).
- e) The communication with you, your information on the best use of the Company's products and/or services (i.e. opportunities to use products/services, bonus programmes), their amelioration as well as for sending you questionnaires regarding your satisfaction with the Company's products and services as well as the customer service provided by the Company.

Said processing (under Section A) serves also the Company's compliance with its legal obligations (see below Section B) as well as the Company's or a third party's legal interests (see below Section C).

### **B. For the Company's compliance with its legal obligations**

The processing of your data as described in Section 1 serves indicatively the following purposes:

- a) The prevention and repression of money laundering and terrorist financing, as well as the prevention, detection and repression of frauds against the Company or its clients, as well as of any other illegal act.
- b) The compliance of the Company with the obligations imposed by the relevant legal, regulatory and supervisory framework in force, as well as with the decisions of any authority (public, supervisory etc.) or Courts.
- c) The protection of the Company's clients, its personnel and their property as well as the Company's facilities and property.

Said processing (under Section B) serves also the Company's or a third party's legal interests (see below Section C).

### **C. For serving the Company's or third parties' legal interests**

The processing of data under Section 1 serves purposes such as the security of the Company's information systems facilities and assets, the prevention and deterrence of criminal acts or frauds, the credit risk assessment taken by the Company, the protection of the Company's legal rights and interests, your information and/ or participation in promotion schemes for new products and/or services, provided that your consent was not chosen as a legal basis for these actions. Prior to this processing the Company ensures that your interests or fundamental rights imposing the protection of your data do not override the Company's interests.

### **D. Upon your consent**

Where the Company has requested and received your consent the processing of your data under Section 1 is based on this consent. In such cases you have the right to withdraw your consent at any time. However, the processing based on your consent prior to your withdrawal remains unaffected.

### **E. Profiling or automated decision-making**

For the fulfilment of the abovementioned purposes especially under points 2.A.c, 2.A.d, 2.B.a as well as for promotion purposes the Company may create your profile by using your data under Section 1.

In case the Company makes a decision solely based on automated processing, including profiling, which produces legal effects concerning you or affecting you in a similar way, it will provide you with specific information and, if necessary, will ask for your consent.

## **3. Who are the recipients of your data?**

For the purposes of fulfilling its contractual and legal/regulatory obligations, of serving its legal interests as well as in cases where the Company is authorized or has received your consent, recipients of your personal data may indicatively be the following:

- a) The Company's employees who are responsible for the evaluation of your requests, the management and the performance of the contract(s) with the Company, the fulfillment of the obligations arising from it/them, as well as of the relevant obligations imposed by the Law.
- b) Entities to which the Company delegates the performance of specific tasks on its behalf (Data Processors), which may indicatively be lawyers, law firms, notaries, bailiffs, information products and/or services providers, electronic systems and network support providers, including but not limited to online systems and platforms, companies responsible for the storage, retention, filing, management and destruction of files and data, other legal persons that process data for the purposes of customers' or market satisfaction surveys, promotion of products and/or services etc., promptly provided, in any case, that security conditions and confidentiality have been met.
- c) Entities of the Eurobank Group of the financial sector for the purposes of total risk assessment, compliance with supervisory obligations and unified treatment of the Group's clients.
- d) Credit Institutions, payment services providers or entities that are necessarily involved in the execution of contracts with you or the execution of requested or activated transactions.
- e) Supervisory, independent, judicial, prosecution, public or/and any other authorities, entities or parties that are responsible for the supervision/monitoring of the Company's activities within their competence.

f) Regarding data related to investment transactions and investment services recipients of your data may be wholly or partly, Eurobank S.A., systematic internalisers, credit institutions and/or investment companies or third parties - market mediators, national or foreign Depositories, operators of trading venues such as the Athens Stock Exchange or the Dematerialized Security System, operators of clearing and settlements systems of capital market instruments as well as other systems or mechanisms for the completion of such transactions, investor compensation schemes, data reporting services providers, consolidated tape providers or approved reporting mechanisms and in general any institution or body involved in providing information for the specific category of transactions and their completion.

#### **4. Is the Company entitled to transfer your data to third countries (outside EU)?**

The Company can transfer your personal data to third countries (outside the EU zone) under the following circumstances:

- a) if the European Commission decides that the third country, a territory or one or more specified sectors within that third country ensure an adequate level of protection; or
- b) if appropriate safeguards have been provided from the recipient, according to the law.

In the absence of the abovementioned circumstances a transfer may take place if:

- a) you (the data subject) have explicitly consented to the transfer; or
- b) the transfer is necessary for the execution of a contract between you and the Company, such as for the execution of orders in which case the necessary data will be transferred to the necessarily involved operational bodies; or
- c) the transfer is necessary for the Company's establishment, exercise or defense of legal claims; or
- d) the Company is obliged by law or an international convention to provide the data; or
- e) the Company is obliged to comply with regulations regarding the automatic exchange of data within the tax sector, as derived from the international obligations of Greece.

In order to fulfil the objectives of points (d) or (e) the Company may transfer your data to the competent national authorities so that the data are delivered to the respective authorities of third countries.

#### **5. For how long will your personal data be stored?**

In case you sign a contract with the Company, your personal data will be stored for as long as the contract stands.

In case of contract termination the Company may store your data until the expiration of the limitation period for legal actions, as defined by law, and more precisely for up to twenty (20) years after the termination of the contract by any means. If during said period legal actions have been taken and the Company or any other Group entity is involved and you are directly or indirectly concerned, the abovementioned storage period will be prolonged until an irreversible judicial decision has been issued.

In case you do not sign a contract with the Company your data will be stored for up to five (5) years of the rejection of your application.

In case a shorter or longer storage period is foreseen by the law or regulatory acts the storage period of your personal data will be amended accordingly.

Documents that have your signature and contain your personal data may be stored electronically/digitally after a period of five (5) years has passed.

## 6. What are your rights regarding the protection of your personal data?

You have the following rights:

- a) To know the categories of your personal data that we store and process, where they come from, the purposes of their processing, the categories of their recipients, the period of storage as well as your relevant rights (right of access).
- b) To demand the rectification or/and to have your incomplete data completed so that they are accurate by providing supplementary statements that justify the need for rectification (right to rectification).
- c) To ask for a restriction of the processing of your personal data (right to restriction of processing).
- d) To object to any further processing of your stored personal data (right to object).
- e) To obtain the erasure of your personal data from the Company's records (right to erasure).
- f) To ask the transfer of your data stored by the Company to another controller (right to data portability).

Please note the following as regards your rights:

- i. Your rights as explained above -points (c), (d) and (e)- may be partly or fully not satisfied if the data are deemed necessary data for the contract regardless of their source.
  - ii. The Company has in any case the right to deny your request for restriction of processing or erasure of your data if their processing or storage is necessary for the establishment, exercise or defense of the Company's rights or the fulfilment of its obligations
  - iii. The right to data portability -point (f)- does not include the erasure of your data. The erasure is regulated under point (e).
  - iv. The exercise of these rights is valid for the future and does not affect previous data processing.
- g) To lodge a complaint to the Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)) in case you consider that your rights are in any way violated.

## 7. How can you exercise your rights?

For the exercise of your rights you may contact the Company in writing to the address

*Eurobank Equities Investment Firm S.A.*  
*10 Filellinon Str., 105 57*  
*Athens, GREECE*

or by sending an email to [info@eurobankequities.gr](mailto:info@eurobankequities.gr)

The Company shall use its best endeavors to address your request within thirty (30) days of its submission. The abovementioned period may be prolonged for sixty (60) more days, if deemed necessary, according to the Company's judgment taking into account the complexity of the issue and the number of the requests. The Company shall inform you within thirty (30) days in any case of prolongation of the abovementioned period.

The abovementioned service is provided by the Company free of charge. However, in case the requests manifestly lack of foundation and/or are repeated and excessive, the Company may, after informing the client, impose a reasonable fee or refuse to address his/her requests.

## 8. Data Protection Officer

You may contact the Data Protection Officer for any matter regarding the processing of your personal data to the address

*Eurobank Equities Investment Firm S.A.*  
*10 Filellinon Str., 105 57*  
*Athens, GREECE*

or by sending an email to [dpo@eurobankequities.gr](mailto:dpo@eurobankequities.gr)

## 9. How does the Company protect your personal data?

The Company takes appropriate technical and organizational measures to ensure the security and confidentiality of your personal data, their processing and protection from accidental or unlawful destruction, loss, alteration, prohibited transmission, dissemination or access and any other form of unlawful processing.

This Data Protection Information replaces from 25.05.2018 (which is the effective date of the Regulation (EU) 2016/679 on personal data protection) any other previous general information regarding the processing of your personal data by the Company.

You can also find the present document on the Company's website ([www.eurobankequities.gr](http://www.eurobankequities.gr)) or by visiting one of its branches.