



BRIEFING ON THE TERMS AND CONDITIONS OF THE PROCESSING OF THE PERSONAL DATA OF PIRAEUS BANK FORMER EMPLOYEES

Piraeus Bank's primary concern is to preserve the personal data of all former employees and Pay-order contract employed persons by the Bank and / or other credit institutions / companies for whom the Bank acts as a universal successor under 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 briefing relates to all former employees of the Bank and / or other credit institutions / companies whose Bank acts as a universal successor, irrespectively of the form of employment and the specific legal basis of the contract that has been concluded, e.g. fixed-term or employment contract of indefinite duration, pay-order contract, contract for the provision of independent services (natural person), traineeship agreement, etc. (hereinafter referred to as "the Contract"), the manner or the time of termination or discontinuance of the Contract, provided that such personal data were transferred either as a physical or electronic file to Piraeus Bank and intends to inform in a simple, clear and intelligible manner about the terms and conditions of the processing of the personal data of former employees (hereinafter referred to as "Former Employees"). Any reference to this information made to Former Employees is deemed to include the former employees of the Bank and other credit institutions / companies for whom the Bank acts as a universal successor, as detailed below.

Credit institutions and / or companies for whom Bank acts as a universal successor:

1. ***Macedonia-Thrace Bank S.A.***
2. ***Piraeus Cards S.A.***
3. ***Hellenic Industrial Development Bank S.A. (ETVA)***
4. ***ETVA Finance S.A.***
5. ***Millennium Bank S.A.***
6. ***Xiosbank S.A.***
7. ***General Bank of Greece S.A.***
8. ***Piraeus Wealth Management S.A.***

The Bank, as Data Controller, processes personal data related to Former Employees specifically because of previous employment with the Bank and / or one of the aforementioned legal entities and assures that the processing is always for legitimate and fair purposes, respecting the principles of fair and transparent processing and the current legislative framework.

It is specified that the personal data of employees who left before 27/03/2013 from the following banks are being kept as follows:

	ARCHIVE OF RETIRED EMPLOYEES BEFORE 27/03/2013
Cyprus Popular Bank	Representative Office of the former CPB in Greece: Special Administrator's Office Cyprus Popular Bank Public Co Ltd 32 Aigialeias & Paradissou Str. - Marousi 15125 · Greece Contact name : Nikolaos Moscholides, Email : NMoscholides@ibg.gr Tel : +30 210 8173341 Fax : +30 210 6896325, Web : www.ibg.gr



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Bank of Cyprus Public Company Ltd	REPRESENTATIVE OFFICE BANK OF CYPRUS PUBLIC COMPANY LIMITED GREEK BRANCH 192 Alexandras Avenue, 11521 Athens www.bankofcyprus.com Assist: Maria Diamantopoulou Tel: 210-6412580 Email: maria.diamantopoulou@bankofcyprus.com Irini Karamitsou Email: Irini Karamitsou@bankofcyprus.com Tel: 2106430373-374,6412570,6412580,6412581, 6412586

(1) Processing:

Processing of personal data means any action taken related to the personal data of the Former Employees (and, per case, as stated below, their relatives) from the original collection to the final deletion and / or destruction and is related to registration, organization, storage, alteration, retrieval, search for information, use, transmission, dissemination or distribution, association, restriction, etc. and is performed with or without the use of automated means (hereinafter referred to as "Processing").

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

(2) Processing purposes:

The purposes of the Processing of the personal data of Former Employees are always based on valid legal basis that justify the legitimacy and necessity of such processing and concern both the protection of the rights of Former Employees and of the Bank.

Processing, which occurs after the termination of the Contract in any way, denunciation and its discontinuance in general, is necessary in order to protect and serve the legitimate interests and legal obligations of the Former Employees and of the Bank (particularly in the context of the labor and insurance legislation, but also the current legislative and regulatory framework) that are born on the occasion of the Contract even after its expiry and are related to its validity period and the employment of the Former Employees and concerns primarily the protection of the legitimate interests of the Former Employees according to the Contract.

Thus, the Bank processes personal data of Former Employees for:

- Maintaining a historical reference file in regard to the purpose of exercising rights, issuing employment-related attestations and satisfying requests related to the former employment of Former Employees, and furthermore the purpose being served is, in regard to the fulfillment of the obligations and protection of the legitimate interests of the Bank resulting from the current legislative and regulatory framework after any termination of the Former Employees Contract in any way, denunciation and its discontinuance in general.



(3) Personal Data / Categories of Personal Data:

Personal data of Former Employees 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 Former Employees and the Bank's legitimate interests.

The personal data held by the Bank have been collected either directly by the Former Employees themselves by completing the necessary forms during the preparation and the signing of the Contract and generally all the required and relative documents, as well as in the context of any other relevant action, either have come into the Bank's possession through the consolidation of systems and / or transfer of physical records of other credit institutions / companies for whom the Bank is universal successor.

Indicatively, the main categories of Personal Data relating to Former Employees are listed and, where applicable, processed by the Bank. The data used are differentiated according to the applicable Administrative Organization, the current circulars of the internal procedures of each credit institution and / or the company that was the original employer of the Former Employees, and the completeness of the files (physical or electronic) for active employees at the date of the merger by Piraeus Bank depends on the data transferred to the Bank by the original employer. In particular for the Former Employees whose employment relationship had expired before the merger with Piraeus Bank, the relevant records retained by the original employer were transferred and stored, as appropriate, in secure storage spaces of the Bank.

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

(i) 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 Former Employees and of their protected family members, birth certificate, family status certificate, etc.

(B) Other personal data, necessary to meet the Bank's obligations to protect the legitimate interests of Former Employees and the Bank.

This category indicatively includes the following categories:

(i) Personal data relating to education and training of Former Employees, 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 of the Former Employee.



- (iii) Evaluation Reports created in the context of the execution of the Contract.
- (iv) Information regarding 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 relating to actions that violate principles, policies of the Bank, and the Code of Conduct and generally the regulations governing the operations of the Bank and any disciplinary action imposed by the competent bodies of the Bank in accordance with the procedures and policies of the Bank, etc.
- (vii) Photo of the Former Employees, in physical and / or electronic, digitized and non-editable form, provided it meets specific specifications set by the Bank and are described in detail in its procedures.
- (viii) Health related data, such as recruitment check-ups, medical certificates, etc.
- (ix) Criminal Records Certificates, due to the specific nature of the Bank's activities.

(4) Recipients of Personal Data:

The access of Former Employees' personal data within the Bank is restricted to authorized employees who have been appointed by the Bank under the context of their role and of their responsibilities and in the performance of their duties and tasks assigned to them.

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

- Competent administrative, judicial, government bodies, under the exercise of their legal duties and responsibilities.
- The Bank of Greece, the European Central Bank and any competent supervisory authority under the exercise of their duties and responsibilities.

Transmission or disclosure may also take place in any other case that may be required in fulfilling the obligations of the Bank arising from 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:

Former Employees' Personal data are stored in a physical, electronic or other appropriate form and are maintained by the Bank 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 date of the official entry into application of the GDPR. In case, that it is desired for the Bank to keep the personal data for an indefinite period in order to meet future needs (e.g. a certificate of past service) after the aforementioned 20 years, Former Employees can provide their 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:

Former Employees' rights with respect to their 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 Former Employees 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 telephone number).
 - (c) The right to erasure ('right to be forgotten')**, whereby personal data may be requested to be erased when there is no longer any valid ground for their processing.
 - (d) The right to restriction of processing** by which the processing of personal data relating to the Former Employee may be restricted, that is, to be used only in specific cases and especially if they are not accurate, if they have been illegally processed, but the Former Employee does not wish them to be deleted, if they are no longer needed for the specified processing purposes but the Employee wishes to retain them for potential future claims, if the Bank has been asked to stop processing and expecting notification whether there are still legitimate grounds for their processing.
 - (e) The right to data portability**, by which the Former Employee can ask for the data to be provided in a structured, commonly used and machine-readable format, or ask them to be transmitted to an organization of his indication.
 - (f) The right to object and oppose processing** when the processing is based on the legitimate interest but there is some particularity in the situation of the Former Employee and therefore wants to oppose to the processing. If this right is exercised, the Bank will no longer process the personal data of the Former Employee unless it can demonstrate compelling and legitimate grounds for the processing.
- The Bank does not take decisions for Former Employees on the basis of automated processing, in any case, the Former Employee may oppose a Bank's decision taken solely on the basis of automated processing, including profiling if it produces legal effects concerning or significantly affecting the Former Employee in a similar way, unless special reasons exist under applicable law.
- (g)** If the processing is based on the consent of the Former Employee, the latter may revoke it at any time, but it is clarified that the lawfulness of the processing made prior to the withdrawal of the consent is not prejudiced.
 - (h) The right to file a complaint** whereby if any or all of the above rights have been exercised but the Former Employee has doubts about the way the Bank processes the data or considers that he is not satisfied with the Bank's replies he may file a complaint to the competent authority.

To exercise their rights, Former Employees, can contact the Group Human Resources & Organizational Group Learning (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 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 employees 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 the personal data of the Former Employees.

The Bank ensures the protection of the personal data of the Former Employees 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 information is posted on the Bank's website under the Human Resources section > Human Resources > Human Resource Management > Data Protection of Human Resources.

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 the Bank's website and the date of the review will be noted.