


Data Privacy Notice

PIRAEUS BANK





The Public Limited Company (Bank) under the company name “**Piraeus Bank S.A.**”, 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 “**Bank**”, 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”.**


This update is addressed to individuals who perform any transaction with the Bank, including but not limited to Customers who have maintained a permanent relationship with the Bank 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 Bank in any capacity.


Personal data processing is the collection, recording, organisation, 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 Bank, either as part of your business relations with it or as part of any update which is received by the Bank from any third party, a natural or legal person or public sector body, while exercising a legal right of their own or the Bank.

In compliance with the current legislative framework, the Bank 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 Bank processes your personal data, which you or your legal representatives have submitted or will submit to the Bank, which are necessary for the commencement, continuation and execution of your business relations with the Bank, either existing or future ones, depending on the product or service provided and the current applicable procedures and policies of the Bank. The personal data you provide the Bank with /submit to the Bank 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 Bank in order to preserve your business relations or to fulfil any of its obligations pursuant to the law and the respective applicable regulatory provisions.
- The Bank 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 Bank's or any third party's legitimate interests, or to perform the Bank's tasks which are carried out in the public interest (e.g., Tiresias S.A. interbanking system, tax and insurance bodies).
- Aiming at protecting commercial credit and transactions, assessing your credit rating and any assumed credit risks and limiting fraud, the Bank has access to your data which may be included in the files kept by the societe anonyme under the company name BANK INFORMATION SYSTEMS S.A., and the distinctive title TIRESIAS S.A. TIRESIAS S.A. and keeps the following records: a) Default Financial Obligation System (DFO) & Mortgages and Prenotations to Mortgages System (MPS); b) Tiresias Risk Control System (TSEK); c) Credit Consolidation System (CCS); d) Lost or stolen Identity Card and Passport System (IPS); e) Terminated Merchants System (TMS); f) Assigned Requirements from Contracts/Public Works Execution Certifications System; g) Credit Rating System. Access to these files is possible without your prior consent, if deemed necessary for the commencement or continuation of your business relations with the Bank (e.g. assessment of any loan/credit request, credit limit review, cheque book issuance, POS credit card payment acceptance and clearance agreement). Detailed information regarding the aforementioned files, the data they contain, their origin, their time of retention by Tiresias S.A. per file or as a whole, as well as the exercise of your rights against Tiresias S.A. pursuant to the new "GDPR" shall be provided directly by Tiresias S.A. (Controller), with registered head office in Maroussi, 2 Alamanas Str., 15125 (tel. +30 210-36.76.700) or at <http://www.tiresias.gr>

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- The Bank may also process your data which it has collected from other third parties, such as publicly accessible sources (e.g., Land Registries/ National Cadastre, 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 Bank 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, business details and business address, financial data (e.g. income tax assessment), 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 (e.g., professional card or student identity card), provided that these data are considered as prerequisite for the commencement or continuation of a specific business relationship.
 - If you do not have a customer code in the Bank, for the execution of any banking transaction (e.g. payment transaction at the cashier desk), the Bank shall collect and process the following data: Full name, father's name and telephone number, while for transactions in cash and depending on the amount of the transaction, you may be requested to provide additional identity card/passport data or data included in any other official identification document, tax identification number, business details, home and business address.
 - Depending on the product/service provided by the Bank or as part of the evaluation of your financial capacity with the purpose of settling/restructuring your debts, the Bank may collect and process additional data, including but not limited to the following: financial details (e.g., tax returns, income tax assessments, Unified Property Ownership Tax-ENFIA, sole proprietorship financial details) or other income sources, property asset valuation, data of the financed or mortgaged property, insurance policies (e.g., coverage against Fire/Earthquakes), data of the Record and Securities Account with the DSS of the ELKAT by HELEX, as well as additional information – as part of implementing the current rules on financial instruments markets. As regards insurance products which are made available through the Bank as Insurance Intermediary, you will be



requested to provide all data considered necessary by the insurance company for the conclusion of your policy, based on the respective legislative or regulatory framework governing their operation.

The collection and processing of your aforementioned personal data by the Bank 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 Bank (e.g., refusal to process and use your e-mail address makes it impossible to use or to continue providing the winbank web banking service, refusal to process and use your mobile number makes it impossible to provide the SMS alert service).

B. Processing of special categories of personal data

The Bank 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 Bank by you or any third party, either natural or legal person, as part of the documentation and safeguard of your and/or the Bank's legitimate interests, in its capacity as the controller (e.g., information on subjects who have been placed into guardianship); c) processing is necessary to protect your, any other individual's, vital interests (e.g., opening and keeping of fundraising accounts); d) the data have been manifestly made public by you; e) processing is necessary for the establishment, exercise or defence of both your legal claims and the Bank'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 Bank 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 Bank shall legally process personal data, provided that processing:

- Is necessary for servicing, supporting and monitoring your business transactions with the Bank and the proper execution of any agreements between you and the Bank.
- Is necessary in order for the Bank to comply with any legal obligations or for the purposes of the legitimate interests pursued by the Bank, which arise from your business transactions with the Bank, or other legal rights of the Bank.
- 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 at any branch of the Bank.

F. Purposes of processing

The processing of your personal data is related to:

- Servicing, supporting and monitoring your business transactions with the Bank, the proper execution of any agreements between you and the Bank and any bank transactions, the examination of any requests for the provision of the Bank's products/services, the performance of the Bank'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 of e-banking services via the winbank e-banking system, subject to your explicit consent.
- The conduct of any audits, as provided for by the current legislative and regulatory framework, the protection of commercial credit and financial transactions, transmission of your data related to your financial behaviour, the assessment of your solvency and search for financial behaviour data (e.g., from the interbanking records of TIRESIAS S.A.).
- The registration, recording and archiving of all types of your orders to the Bank, which have been given in writing, by electronic means or by telephone, in order to conclude transactions and for the protection of transactions.
- The upgrading of the Bank's products and services and the promotion of any products and services of the Bank, the Piraeus Group companies and any collaborators of the Bank, subject to your prior consent.
- The execution of any requests towards the Bank or the investigation of your complaints regarding any products and services offered by the Bank.
- The compliance with the Bank's legal obligations according to the current legislative and regulatory framework (e.g., legislation on the prevention and control of money laundering and against terrorism, tax and social security provisions).
- The protection of the Bank's legitimate interests in relation, among others, to the following: a) any legal claims of the Bank 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 Bank's operational and credit risks; e) physical security and the protection of persons and property (e.g., video surveillance).

G. Automated decision making and profiling

The Bank 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 and tax evasion at your expense or at the expense of the Bank or any third party (e.g., malicious debit of a credit card, unusual transaction in a bank account), as well as for the provision of ensured and reliable services by the Bank (e.g., investment products and services), or if the processing is necessary for the conclusion or execution of an agreement (e.g., credit scoring, which shall be based on personal data received directly by you or after a search in the financial behaviour database of TIRESIAS S.A., and which uses as criteria the subject's income, financial obligations, profession, and the compliance with its contractual obligations as part of the subject's previous financing, which the subject has received from the Bank or any third creditor, in order to assess your credit rating and to grant you the respective financing).

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

After the Bank 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 Bank processes information regarding the Bank's services you use and/or any standard banking transactions you perform (e.g., tax payment by credit card), 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 Bank's products / services, including any profiling, by submitting a request to any system of the Bank.

I. Data retention period

The Bank 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 Bank ended. In case any request on your cooperation with the Bank 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 Bank's business and operational units' employees, within the range of their responsibilities, as well as to the 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 Bank and/or the Group.

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

- Undertakings (domestic and foreign), to which the Bank has partly or wholly assigned the processing of your personal data on its behalf, and which have assumed a confidentiality obligation towards the Bank 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 Bank; or b) as part of their regulatory obligations to respect the principle of confidentiality, such as:
 - i. Debtor information companies according to Law no. 3758/2009, as currently in force, which have been registered in the relevant registry, in order to further inform you, as Debtor and/or Guarantor, and to negotiate the time, method and other terms for the repayment of your overdue debt. The details of any company cooperating with the Bank shall be available on the Bank's website (www.piraeusbank.gr), in the section Useful Information> General Data Protection Regulation (GDPR).
 - ii. Payment service and payment processing companies/organizations (e.g. DIAS system, VISA, Mastercard).
 - iii. Credit Institutions, Payment Institutions.
 - iv. Associated undertakings, such as: Investment societies anonymes (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.

- v. Loans and Credits Management Companies, according to the provisions of Law no. 4354/2015, as currently in force.
- vi. 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 Bank's claims in case of failure to comply with any obligations you assumed by means of an agreement you have concluded with the Bank (e.g. transmission to cooperating lawyers, law firms and court bailiffs, notaries, engineers and evaluators).
- vii. Companies engaged in the digitization and management (storage, destruction) of physical files.
- viii. Companies issuing and dispatching statements
- ix. Companies engaged in the submission of property rights statements of the Bank in regions which have been or shall be included in the National Cadastre.
- x. Companies cooperating with the Bank for the participation in conformity programs or for the promotion of the Bank's products and services.

The Bank 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.

- Undertakings/companies affiliated to the Bank, within the meaning of Article 32 and Annex A of Law no. 4308/2014.
- TIRESIAS S.A. for the protection of credit, the consolidation of transactions and the restriction of fraud, as well as the estimation of the Customer's credit worthiness.

- Any transmission or disclosure, as required by the current statutory, legal and regulatory framework in general or a court judgement (transmission to judicial authorities, tax authorities, supervisory bodies, intermediaries) in compliance with the provisions on banking secrecy.
- Receivables acquisition companies according to Law no. 4354/2015, as currently in force and special purpose vehicles for receivables securitization purposes, and corporations of the financial sector in case of assignment of the Bank's receivables arising from credit agreements.
- 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.

The Bank 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. By way of illustration and through the respective national authorities, the Bank may transmit your personal data within the scope of the legislation on the Common Reference Model which was developed by the Organization for Economic Cooperation and Development (OECD), or pursuant to the act on tax compliance of foreign accounts by US citizens or US residents holding foreign accounts (FATCA – Foreign Account Tax Compliance Act).

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 Bank, 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 Bank'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 Bank'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 Bank or for the purpose of legitimate interests which are pursued by the Bank 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 Bank S.A., Data Protection Office (DPO)"** and shall be sent either to DPOOffice@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), in the section Useful Information> General Data Protection Regulation (GDPR). A special form for the exercise of the right of access shall be available at all branches.

Any refusal of the Bank 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



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Based on the respective applicable policy on data protection and in the context of the current legislative and regulatory framework, Piraeus Bank may review or amend this update, which shall always be up to date and available on the Bank’s website (www.piraeusbank.gr), in the section Useful Information> General Data Protection Regulation (GDPR).

This is a translation of the original Greek text. This translation is provided for information purposes only. The original Greek text shall prevail in case of any discrepancy between the Greek Text and the translation in English.