

Hellenic Bank Privacy Notice for the Protection of Personal Data

September 2022

1. Introduction

This notice ("Privacy Notice") provides an overview of how **Hellenic Bank Public Company Ltd** (the "Bank") is **Processing Personal Data** of natural persons. This Privacy Notice is directed and applies to you in cases where:

- you are either a current or potential customer of the Bank (including if you have expressed your interest in the Bank's products/ services), or
- you represent a customer of the Bank, or
- you have provided or may potentially provide guarantees, indemnities or other securities to the Bank, or
- you are authorised representatives/agents/introducers/statutory directors/ secretary/ contact persons or shareholders/beneficial owners of legal entities which have a business relationship with the Bank, or
- you have provided or are requested to provide references for a customer or a member of staff of the Bank, or
- you are connected with a customer or a member of staff or a business associate of the Bank and your Personal Data is provided under a regulatory obligation e.g. to manage possible conflicts of interest and other regulatory obligations, or
- you have parental responsibility or guardianship over a customer of the Bank who is a minor, or
- you have been in the past any of the above (please refer to section 7), or
- you now have or had any business relationship with the Bank in the past including being a shareholder or bondholder, or
- your Personal Data have or may in the future be lawfully obtained by the Bank in the normal course of its business.

Processing may take place at Group level as provided under the General Data Protection Regulation 2016/679 ("GDPR"), where a legitimate interest is justified. Group being the Bank and any legal entity which is considered a subsidiary pursuant to Companies Law Cap. 113.

For the purposes of this Privacy Notice "**Processing**" refers to 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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

For the purposes of this Privacy Notice, "**Personal data**" shall mean any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The types of Personal Data processed depends, largely, on the products or services you request from the Bank, or the Bank agrees to provide to you, from time to time.

In all cases, the Bank is committed to process your Personal Data in compliance with the provisions of applicable Personal Data protection law (including the GDPR, applicable as of 25 May 2018). The rights provided to you by the GDPR in relation to the Processing of your Personal Data by the Bank are also described in this Privacy Notice.

2. Who is responsible to process your Personal Data

Your Personal Data will be held by the Bank (Hellenic Bank Public Company Ltd is a licensed credit institution registered in the Republic of Cyprus under registration number HE 6771), which will be responsible for its processing. If you wish to contact the Bank in relation to the processing of your personal data, you may do so using the following contact details:

Corner Limassol and 200 Athalassas Avenues,
2025 Strovolos,
P.O. Box 24747, 1394 Nicosia, Cyprus.

You may contact the Bank's Data Protection Officer at:
Hellenic Bank Public Company Limited
173, Athalassas Avenue,
2025 Strovolos,
P.O. Box 24747, 1394 Nicosia, Cyprus.
E-mail: dataprotection@hellenicbank.com

3. What Personal Data is Processed and from which sources

The Personal Data Processed may be any or all of the following types:

Data type	Description
Identification data including national identification numbers	Information which can directly identify you such as name, surname, date of birth, gender, place of birth, citizenship and identification numbers or codes given or issued by a governmental service such as national social insurance number, tax identification code, ID number, Passport number, Driver's license number and other personal data of similar type.
Contact	Contact details such as telephone number, home address, work address and email address.
Financial	Information on your personal wealth including your assets, details of the assets, streams of incomes, expected incomes, personal financial position, salary, economic status, account numbers, IBAN and other financial information. In case you receive or applied to receive investment services, financial data to be obtained include knowledge and experience with MiFID II products (i.e., shares, bonds, funds and interest rate/currency products), your investment strategy and scope, details of your personal investment portfolio, personal financial objectives.
Socio-Demographic	This includes details about your work or profession, nationality, education, marital status and where you fit into general social or income groups.
Transactional	Details about payments to and from your accounts with the Bank (including direct debit/ standing order data), insurance claims you make and tax information (for example information on the obligation to pay special contribution for defence).
Contractual	Details about the products or services we provide you with. This includes data concerning your accounts and cards, like account number, IBAN, card number and card issuance and expiry dates. Specific information relevant to existing/previous insurance policies, such as policy numbers, products, premiums, properties, claims and health data which are processed only following your explicit consent.
Locational	Data we get about where you are. Such data may come from your mobile phone, the address where you connect a computer to the internet, or a shop where you buy something with your card.
Behavioral	Details about how you use our products and services.
Technical/Digital	Details of the devices and technology you use, your digital activity and systems logs which are captured by the Bank's information technology systems when you use them, IP addresses and the credentials you use to connect to our digital platforms available.

Data type	Description
Communications	What we learn about you from letters, emails and conversations/meetings between us.
Social Relationships	Your family, associates and other relationships you declare for the purposes of our business relationship.
Documentary	Details about you that are stored on documents in different formats, or copies of them. This could include things like your specimen signature, passport, identity card, driver's license or birth certificate.
Video and sound recordings	Video footages recorded by the CCTV system of the Bank in which you may be captured when you visit a branch, or voice call recordings when you call us or video recordings when you make an online meeting with us.
Special categories of Personal Data	<p>The law treats some types of Personal Data as special. These include Personal Data concerning health and data relating to criminal convictions and offences.</p> <p>The Bank may process health data in the context of the assignment of insurance products as collateral for credit granted by the Bank or in the Bank's capacity as distributor of insurance products or in the case you provide such data to support your economic conditions during a credit assessment or restructuring. The legal basis used for such processing is your Consent (refer to section 4 below).</p> <p>The Bank may, also, process data relating to criminal convictions and offences as part of the Bank's initial and periodic review, as required by law. The legal basis used for such processing is the Legal Obligation (refer to section 4 below).</p> <p>Through all financial transactions, various types of behavior patterns can be revealed, which may include special categories of personal data. Therefore, there is a good chance that the Bank when processing information about financial data transactions will also process special categories of personal data (e.g., When you pay for medical costs to a doctor of certain specialization).</p>
Children's data	<p>For the purposes of this Privacy Notice, "children" are individuals who are under the age of eighteen (18).</p> <p>We may process Personal Data in relation to children only after we obtain their parents' or legal guardian's consent or unless otherwise permitted by law.</p> <p>Where the Bank offers Information Society Services directly to a child, the Processing of the Personal Data of a child is carried out based on the child's consent if the child is above 14 years old. Where the child is below the age of 14 years, such Processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental or guardian responsibility over the child.</p>

The Bank collects Personal Data from the following sources:

- Directly from you
 - When you apply for the Bank's products and services
 - When you talk to the Bank on the phone or in physical presence
 - When you use the Bank's websites and digital banking (including mobile device applications, online banking and Application Programming Interface (APIs))
 - In emails and letters
 - In insurance claims or other documents
 - In financial reviews and interviews

- In surveys
- If you take part in the Bank's competitions or promotions
- When it is necessary in the context of the business relationship with you
- Indirectly, for example through:
 - Your authorised representatives
 - Persons/Organisations introducing you to the Bank (i.e., Fiduciary Service Providers, Approved Introducers)
 - Persons providing references for you, including your employers
 - Customers or members of staff providing your contact details in order for the Bank to receive references from you or as part of the reporting of a conflict of interest.
 - The legal entity you represent or in which you act as agent/ introducer / statutory director / secretary / contact person / shareholder / beneficial owner or any other role which is necessary for the execution of the Bank's business operations with that legal entity.
- From other publicly accessible sources such as:
 - the Land Registry Office,
 - the Registrar of Companies and Official Receiver,
 - the Bankruptcy Archive,
 - commercial registers,
 - the Press/Media, and
 - the Internet.
- Other resources such as:
 - Other Hellenic Bank Group companies for the purposes of managing operations and/or risks at a group level
 - Artemis Bank Information Systems Ltd for the purposes of being able to provide to you the services and/or products requested
 - Other service providers such as Refinitiv and Ethixbase, for the purposes of receiving information necessary for our enhanced due diligence obligations under the AML Law.
 - Correspondent banks, other financial institutions, card associations, companies that process payments such as JCC Payments Systems Ltd, for the purposes of executing your payments
 - Insurance companies for the purposes of providing security against your credit facilities and or in the capacity of the Bank as Distributor of Insurance Products
 - Real Estate agents in the case you express interest in buying a property managed or owned by the Bank and vice versa
 - Other clients of the Bank in the case you participate in a transaction passing through the systems of the Bank
 - Government and law enforcement agencies, risk intelligence data bases or other data bases where it is necessary to assess the risk undertaken by the Bank (i.e., credit risk, money laundering risk)
 - CCTV systems for the purposes of security, fraud and crime prevention
 - Other legal entities from which the Bank purchases a portfolio of assets / liabilities under the Law for the Transfer of Banking Business and Collateral of 1997 to 2011 or the Sale of Credit Facilities and Related Matters Law 2015.

4. Why we Process your Personal Data and on what legal basis

(a) Legal Basis

The law allows the Bank to process Personal Data, including sharing Personal Data outside the Bank, only if the Bank has a proper reason to do so. Specifically, the Bank must have one or more of the following reasons to use your Personal Data:

To fulfil a contract you have with the Bank or to take any steps, at your request, prior to entering into a contract with the Bank - The Bank processes your Personal Data in order to provide you with banking and financial services, in accordance to the contracts concluded with you and/or in the course of your application prior to the conclusion of a contract in order to complete your acceptance process as a potential customer for the specific product/service, and/or to execute your orders.

When it is the Bank's legal obligation - The Bank processes your Personal Data in order to comply with requirements of the legal and regulatory framework governing its operations including but not limited to banking legislation, investment services legislation, anti-money laundering legislation, tax legislation and regulations, directives/ guidelines issued by the Bank's regulators (including the Central Bank of Cyprus, the European Central Bank, CySec and other authorities such as Tax Authorities).

When it is in the legitimate interests of the Bank or another person with whom the data are shared - The Bank may process your Personal Data in case it has a legitimate interest to do so, provided this interest does not unfairly go against what is right and best for you. A legitimate interest is when the Bank has a business and/or commercial reason to use your Personal Data. When the Bank bases the Processing of your Personal Data on legitimate interest you have the right to object at any time to such Processing, on grounds relating to your particular situation. The Bank shall no longer process your Personal Data unless it demonstrates compelling legitimate grounds for the Processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Where Personal Data are processed for the purposes of direct marketing, you have the right to object to such Processing, including profiling to the extent that it is related to such direct marketing, whether with regard to initial or further Processing, at any time and free of charge. Where you object to Processing for direct marketing purposes, the Personal Data shall no longer be processed for such purposes.

When you consent to the use - The Bank may base the Processing on your consent if such consent is free, specific, and has been given after you have been clearly informed about the details of the Processing. You have the right to withdraw your consent at any time, but such withdrawal does not affect the legality of the Personal Data processed prior to the withdrawal.

When it is in the public interest or in the exercise of official authority vested in the Bank - The Bank may process your Personal Data when it is necessary for the public interest by virtue of official authority granted to the Bank and provided that the Processing is performed lawfully and fairly, in a clear, precise and transparent manner.

(b) Purposes of Processing

Indicatively, we process your Personal Data for the following purposes under the legal basis marked respectively on the table below. This Processing may take place at Bank or Group level.

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<p><u>Provision of services</u></p> <p>We need to process your Personal Data in order for the Bank to be able to review your application for the Bank's products and services and to provide to you the products and services requested (Deposits including issue and handling of cheques/chequebooks and cash handling services, Lending including securities handling and loan</p>	X	X	X	X	X
			<p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> • To perform company searches by third party service provider • To monitor the validity of insurance contracts offered as security on credit facilities 		

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<p>restructurings under arrears management, Investment, Custodian & Paying Agent services, Card services including ATMs and Card Scheme applications such as Mple, Digital services including but not limited to Mobile App, Online banking, APIs, digital wallets, services through customer contact center, e-signature applications etc, Payment services, Factoring, Trade Finance, Call Center etc). Personal Data processed shall be restricted to the necessary data for the purposes of the service(s) received. For example, when you receive credit services the Bank will require a detailed analysis of your financial data whilst this data may not be required if you are simply a depositor.</p> <p>Additionally, your personal data may be processed for any service requested by you including the exercise of your rights under GDPR as analysed in section 9 below and the processing of your applications submitted via the Bank's webpage.</p>			<ul style="list-style-type: none"> • To process the personal data of third parties participating in payments to/from clients • To manage arrears through third-party service providers • To obtain technical support on Bank systems from third party service providers (vendor may process personal data when troubleshooting / updating systems) • To facilitate the conclusion of a service using third parties such as JCC e.g., for cheques clearing and card payments etc • To record calls with non-clients when they seek information from the Bank's Call Center • To give access to clients' representatives on various Bank's channels/applications to serve the purposes of the Bank's clients • To provide general information about the Bank and its products. 		
<p><u>Comply with Anti-Money Laundering (AML) regulatory framework</u></p> <p>We need to process your Personal Data in order to comply with our regulatory obligations under AML i.e. we need to review and update your Personal Data /economic profile and transactional activity, we need to exercise due diligence and investigate the source and destination of funds of the transactions you carry out through the Bank, we need to carry out further investigations in case we identify transactional activity which is not within your profile, we need to assess your data in case your will act as an approved introducer for clients of the Bank.</p> <p>The Bank may use external service providers such as Refinitiv and Ethixbase to obtain information in order</p>	X	X	<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> • To exercise due diligence in relation to new clients' onboarding or to existing clients at the review of the customer relationship or their transactions by carrying out searches in available databases either directly or through third party service providers. • To defend the Bank in litigation procedures 		X

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
to comply with its enhanced due diligence obligations under the AML Law. You may refer to the webpages of those companies in order to see how they process your Personal Data https://www.refinitiv.com/en/policies/privacy-statement / https://ethixbase.com/privacy-policy-2 .					
<u>Comply with Regulatory Reporting requirements and other legal obligations</u> We need to process your Personal Data in order to comply with our regulatory reporting obligations of the Bank to submit reports. The Bank is obliged to report to regulators various information which sometimes includes client Personal Data. The Bank is also obliged to report to tax authorities in accordance with the legal / regulatory framework of the Republic of Cyprus, the EU, other countries such as USA for FATCA ¹ , where applicable. Also, the Bank is obliged to adhere to and/or take action and/or comply with court orders.		X			
<u>Manage risks</u> In our operations we are called to manage various risks and ensure that our clients, counterparties, stakeholders and the Bank are properly safeguarded against those risks. For the purposes of managing those risks we may need to process your Personal Data (e.g. observation of CCTV systems for the purposes of security, fraud and crime prevention, maintaining log books of visitors to the Bank's buildings, when validating financial models used by the Bank, when monitoring liquidity and interest rate risks, when over-viewing the overall quality of the banking portfolio, when investigating threats/ vandalism/ robbery / terrorist act against members of staff, when enhancing IT security, when handling conflict of interest. Indicatively the risks managed include: <ul style="list-style-type: none"> Physical access to our buildings 		X	X Legitimate interest pursued: <ul style="list-style-type: none"> To implement proper monitoring tools to prevent malicious activity To investigate information security incidents and/or fraud suspicions arising from alerts created from specialised systems used by the Bank To monitor the access to the Bank's premises and other locations to ensure security of staff, customers, visitors and assets To keep track of visitors who enter the Bank's premises for security purposes 		

¹ The Foreign Account Tax Compliance Act (FATCA), which was passed as part of the HIRE Act, generally requires that foreign financial Institutions and certain other non-financial foreign entities report on the foreign assets held by their U.S. account holders or be subject to withholding on withholdable payments.

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<ul style="list-style-type: none"> • Crime and fraud • Cyber & Information security • Operational risks • Financial risks • Breaches and other incidents • Regulatory risks • Conflict of interest 			<ul style="list-style-type: none"> • To assess incidents or threats of crime in the Bank's premises or on the Bank's assets or people. • To manage possible conflicts of interest 		
<p><u>Preparation of Financial Statements/ Manage costs and income</u></p> <p>We may process your Personal Data during the preparation of our financial statements, during assessment, management and reporting of costs and income, during setting up the models for the parameters of provisions (including at group level).</p>	X	X	<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> • To facilitate the financial affairs of the Bank 		
<p><u>Internal Operations</u></p> <p>The Bank may process your Personal Data during administrative internal operations such as:</p> <ul style="list-style-type: none"> • monitoring data quality and accuracy, • providing operational support to the client-front units, • management of customer relationships through specialised systems e.g. CRM-Customer Relationship Management system, • through call & video recordings of meetings with you, • issuing access cards to control visits at its buildings • preparing & using internal reports and lists (such as the Insider List required under the Market Abuse Regulation), which may include your Personal Data which are used by the relevant units of the Bank for the purposes of executing their work, • during the handling of requests which require expert opinion such as legal opinion, or opinion from other control functions and experts such as Compliance Unit, Data Protection Office, Information Security, Tax, IT and Organisation & Methods, • checking the smooth operation of automated processes i.e., automatic renewal of overdraft 	X	X	<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> • To ensure that data kept is accurate and up to date and to check for any discrepancies • To record calls for better service / improvement of services • To provide support/advice to departments of the Bank, where requested • To be able to communicate, when necessary, with the third-party providers • To monitor the Bank's deposit and loan portfolio for the purposes of liquidity, capital adequacy and strategy monitoring. • To ensure that automated processes run smoothly e.g., the interest is correctly charged • To be able to provide reports and information to the Board and its Committees in order to successfully fulfil their obligations. • To check/confirm data to be sent to clients 	X (for recordings)	

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<p>limits, charges, content of letters produced automatically etc,</p> <ul style="list-style-type: none"> for anonymization and for statistical analysis of the usage of the Bank's products and services and/or for testing the Bank's products and services as part of the Bank's Product Governance Policy and for the purposes of further product / service enhancement or development of new products / services aiming value added to clients, maintaining and publishing internally, with access as deemed necessary, the names and other necessary details of approved counterparties i.e., valutors, introducers, translators or other counterparties such as technical support counterparties, cleaners, landlords for rented property, authorised signature books of other banks, etc for collecting and recovering money that is owed to the Bank, defending the Bank' legal rights, for responding to third parties, provided that these third parties are authorised to receive such information, and/ or to regulatory inquiries for process automations. <p>Additionally, the Bank may share your personal data with third parties as listed in section 5 of this Privacy Notice for the internal operation purposes listed below:</p> <ul style="list-style-type: none"> to enable the Bank to obtain valuations on properties offered as securities – to external valutors to enable the Bank to defend itself in court actions – to external legal advisors to enable the Bank to comply with court or regulatory orders – to regulators or the police or regulatory agencies to enable the Bank to manage vendor relationships in outsourcing arrangements - to third party vendors including cloud service providers and Information Technology support. 			<ul style="list-style-type: none"> To produce reports for business monitoring and growth. To be able to investigate client claims of overcharges and/or for court cases To develop new products and services or enhance existing. Anonymised data may be produced and shared. To ensure that divisions' strategic targets are met by using external support and expertise. To improve processes in terms of cost, time and quality. <p>When sharing your personal data with third parties or when receiving your personal data from third parties, the Legitimate Interests pursued are listed under the column "Purposes of Processing"</p>		

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<ul style="list-style-type: none"> to enable the Bank to manage its correspondence needs – to couriers to enable the Bank to insure its risks – to insurance brokers and insurance companies to enable the Bank to comply with its reporting regulatory obligations – to reporting platforms (e.g APA and ARM under investment services - MiFid II). <p>Furthermore, the Bank may obtain information from third party sources as listed in section 3 of this Privacy Notice for the internal operation purposes listed below:</p> <ul style="list-style-type: none"> to establish the ownership and status of assets offered as security – from the Land Registry to establish the ownership structure and status of companies-clients of the Bank - from the Registrar of Companies to screen for sanctions and other negative information on clients – world check and / or other relevant data bases. Please refer to purpose <u>“Comply with Anti-Money Laundering (AML) regulatory framework” for more details.</u> 					
<p><u>Administration of Bank systems</u></p> <p>The Bank may process your Personal Data to ensure the smooth operation of the systems utilised in its operations i.e. to administer user access rights, for troubleshooting, configuration, infrastructure management, data integration between systems used, administer parameters and proxies on web traffic and email gateway.</p>			<p style="text-align: center;">X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> To be able to administer the Bank’s systems in order to ensure their smooth and accurate operation/ administration To provide access to Bank systems where necessary in order for members of staff to be able to perform their tasks/duties. To access data in systems in order to identify system glitches To provide access to third party service providers in order to support the IT 		

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
			Department with the heavy workload and for the implementation of new modules/features in various systems.		
<u>Audits / Investigations</u> The Bank may process your Personal Data during audits / investigations carried out either by internal auditors and other control functions or by external auditors and/or regulators on the Bank's operations.		X	X Legitimate interest pursued: <ul style="list-style-type: none"> To be able to enhance the Bank's controls and to outsource the internal audit of Information Technology functions and or other departments, where external expertise is required. 		
<u>Responding to complaints</u> The Bank may process your Personal Data when a complaint is submitted (including complaints in relation to harassment) for the purposes of responding and/or handling that complaint.	X	X	X Legitimate interest pursued: <ul style="list-style-type: none"> To process any personal data provided by you and/or held by and/or given to the Bank in order to respond to and/or handle the complaint received 		
<u>Communication</u> The Bank may process your Personal Data for the purposes of communicating with you indicatively for the following reasons: <ul style="list-style-type: none"> to provide general information on Bank issues i.e. closing of branches, working hours etc. to provide specific information for a specific product/service you hold to provide you with account statements, charges analysis, transaction vouchers/ transactional activity, interest certificates etc. for marketing purposes (i.e. direct marketing via mail/post and live calls with human intervention, direct marketing via electronic means without human intervention) 	X	X	X Legitimate interest pursued: <ul style="list-style-type: none"> To communicate with clients in relation to general information on Bank issues, or specific information for a product/service of the customer, or for general campaigns to inform clients about similar products/services of the Bank 	X	

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<ul style="list-style-type: none"> to inform you of the results of campaigns/competitions/draws to which you participated. to inform you of cases of fraud and or breaches. <p>The Bank may also communicate with natural persons who are not clients of the Bank:</p> <ul style="list-style-type: none"> whose Personal Data were obtained in conferences etc in order to promote Bank's products and services If your contact details have been obtained by a member of staff for the purposes of contacting you on emergency situations or by a member of staff/prospect member of staff or customer for the purpose of receiving references. for direct marketing (even if the Personal Data/contact details are available to sources open to the public) If you are an investor or market analyst or participant to provide updates/resolving queries in relation to the financial performance of the Bank, in accordance with your requests or if you are a shareholder or bond holder receiving notifications in accordance with legal requirements or generally. 					
<p><u>Competitions/ Promotions</u></p> <p>The Bank may carry out promotional and rewarding competitions on social media. Your Personal Data may be processed by the Bank for the purposes of the competitions in accordance with the terms disclosed from time to time in relation to the specific competition, provided that you decide to participate.</p> <p>The Bank may also process your Personal Data during competitions/campaigns if you are an existing client of the Bank using its products/ services to reward you for your commitment and preference to the Bank's products. The campaigns may be executed via any of your contact</p>	X		X	X	

Legitimate interest pursued:

- To promote the usage of the Bank's products and reward clients through the opportunity to win gifts and benefits.

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<p>details provided to the Bank i.e., via sms, email, mail, call.</p> <p>Additionally, the Bank may process your Personal Data if you are participating in shooting and photographic material to be used in competitions/ promotional material.</p> <p>Where needed a separate specific Privacy Notice will be provided to you.</p>					
<p><u>Sell Loans Portfolio</u></p> <p>The Bank may process your Personal Data in preparation for and/or in the process of disposing, selling and/or entering into sub-participation arrangements regarding all or part of its loan portfolio (whether performing or non-performing) to one or more third parties as part of the execution of the Bank's strategic plans and/or its Non-performing Assets Strategy.</p> <p>The relevant processing may involve:</p> <ul style="list-style-type: none"> • Identification of a perimeter of loan assets to be marketed for disposal/ sub-participation, on the basis of selected economic criteria such as being in default, limited prospects of settlement in the short term etc • Provision of restricted access to potential third-party buyers / investors for the conduct of a due diligence exercise which would allow them to provide an offer for the acquisition of / sub-participation in the selected portfolio of loans. • Provision of restricted access to the Bank's legal and financial advisors in support of the transaction (which may include assisting with any redactions that may be needed in order to minimize information sharing at the early stages of the transaction. • Upon completion of the transaction, transfer of the relevant personal data to the buyer / investor 			<p style="text-align: center;">X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> • Achievement/execution of the strategic objectives/ plan of the Bank 		

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<p><u>Buy Loans Portfolio</u></p> <p>The Bank may Process Personal Data for the purposes of purchasing loan portfolios / credit facilities from other banks and / or asset management companies as part of the execution of its strategic plan.</p> <p>Processing of Personal Data is required in order to progress the purchase of a portfolio of loans and will involve:</p> <ul style="list-style-type: none"> Assessment of perimeter of loan assets to be purchased (e.g., meeting a number of economic criteria such as the contractual balance, duration repayment status, type of loans, collaterals, days past due, etc). Provision of restricted access to the Bank to data and information for the conduction of a due diligence exercise, which would allow the Bank to provide an offer for the acquisition of the selected portfolio of loans. <p>As part of this process, the Bank may employ financial and legal advisors who will have access to data in order to support the performance of a due diligence exercise. This is necessary to enable the Bank to assess the relevant portfolio and its value, in order to determine the price that it would be willing to pay for that portfolio.</p>	X		<p style="text-align: center;">X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> Achievement/execution of the strategic objectives/plan of the Bank 		
<p><u>Record keeping</u></p> <p>The Bank needs to keep record of its activities as required by the regulatory framework and/or to defend its legal rights and interests pursued.</p> <p>Your Personal Data will be maintained under this record keeping obligation. You may refer to the specific paragraph in this Privacy Notice with regards to the record keeping provisions.</p> <p>In this regard the Bank many outsource record keeping to companies specializing in these services.</p>		X	<p style="text-align: center;">X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> Outsourcing for cost saving and expert services 		

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<p><u>Cookies</u></p> <p>When you visit our website or use our Digital Products (like Web Banking, Mobile App) our system processes information about your visit such as your IP address and your browser type.</p> <p>You can manage these cookies in accordance to the Cookies Policy which will be available to you on the Bank's website.</p>			<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> to monitor and analyse the functionality and accessibility of the Bank's web pages/applications and user preferences. 		

(a) Profiling and Automated decision making

"Profiling" means any form of automated Processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Specifically, profiling is a procedure which may involve a series of statistical deductions. It is often used to make predictions about people, using data from various sources to infer something about an individual, based on the qualities of others who appear statistically similar. Profiling may involve three distinct stages:

- Personal Data collection;
- automated analysis to identify correlations;
- applying the correlation to an individual to identify characteristics of present or future behaviour.

The Bank does not make decisions solely on the basis of automated Processing; however, part of your Personal Data may be automatically processed as part of our assessment of certain personal aspects (profiling), indicatively for the following purposes:

- Credit scoring.
- Assessments for the purpose of combating money laundering and fraud.
- Marketing of new products and services of Bank and/or of companies within the Group or of third parties cooperating with the Bank, as long as you have given your consent.

5. Who receives your Personal Data

(a) Within the Bank

Within the Bank, access to your Personal Data is given to those officers who require such access to perform the Bank's contractual, legal obligations and other internal activities.

(b) Outside the Bank

Access to your Personal Data may also be given to **third party service providers and agents employed by the Bank** to enable more efficient and effective execution of its business operations, provided that an appropriate legal basis exists. Except where they act as separate controllers, service providers and agents appointed by the Bank are required to follow the Bank's instructions in relation to the Processing of Personal Data, provide written assurances that it processes the Personal Data in accordance with GDPR and the information shared will be restricted to the minimum necessary for the specified and explicit purposes.

These are mainly organisations from the categories listed below:

- Property Valuators and surveyors
- Arrears management companies / Debt collection agents
- Visa / Mastercard / JCC / SEPA Direct Debit Scheme, other payment service agents and participating merchants
- Third Party Providers (TPP) where API's are used at the request of the customer
- Fund Managers/ Trustees /Agents for reporting purposes (such as those required under MiFiD II)
- Introducers
- Couriers
- IT systems/solutions providers and cloud service providers
- Insurance Companies / Re-insurance agents
- Advisory and professional service providers
- Auditing service providers / Forensic Auditors / Statutory Auditors
- Legal Advisors
- Companies offering marketing services /advertising agencies/ conference organizers
- Record Keeping companies
- Printing companies
- Credit reference agencies
- Providers of data screening services for anti-money laundering purposes
- CCTV system providers
- Other service providers supporting any of the operations of the Bank.

Access to your Personal Data may also be given to **other credit institutions, financial services institutions and comparable institutions** for the purposes of facilitating payment transactions and/or lending.

The Bank may be required to share your personal information **with regulatory and other authorities and public bodies** in Cyprus and the European Union, either under a legal obligation or on the basis of the Bank's legitimate interests:

- The Central Bank of Cyprus, the European Central Bank, the European Banking Authority
- The Cyprus Securities and Exchange Commission
- The police and MOKAS
- Tax authorities
- Financial Ombudsman
- Commissioner for Personal Data Protection
- Artemis information exchange mechanism
- Bank Deposits Guarantee Fund, Credit and Other Institutions Resolution Fund
- European Guarantee Fund, in case your loan facilities are granted under this arrangement
- Treasury of the Republic of Cyprus, in case your loan facilities are granted under the Government Guarantee Scheme
- Land Registry
- Cyprus Certification and Pricing Company
- Other regulators, authorities and public bodies insofar as a statutory or official obligation exists.

The Bank may, also, share your personal information with **potential or actual investors /buyers of a portfolio of assets/part of business of the Bank**. Specifically, the Bank may choose to sell, transfer, or merge parts of its business, or assets, including to grant sub-participation rights in respect of a loan portfolio held by the Bank, or the Bank may seek to acquire other businesses or merge with them. During any such process, the Bank may share your Personal Data with interested parties. The Bank will only do this if the other parties agree to keep your Personal Data safe and private. In any such case you will separately be notified in accordance with the requirements of the relevant regulatory framework. Upon completion of the relevant transaction, the buyer / investor will become an independent controller of your Personal Data transferred to them by the Bank.

Additionally, the Bank may have a legitimate interest in transmitting your Personal Data **within the Group** for internal administrative purposes and/ or a legal obligation to do so i.e. for group regulatory reporting.

6. Transfer of Personal Data to third countries or international organisations

The Bank will only transfer your Personal Data to a country outside the EEA (a "third country"):

- If this is required for the execution of your orders (for example, when payments are made to a person in a third country, or for payment orders through a correspondent bank in a third country, such as dollar payments or for card services offered for example by VISA and Mastercard);
- if this is prescribed by law (for example, reporting obligations under tax law);
- in the context of data Processing undertaken by third parties on behalf of the Bank and according to the Bank's instructions.

If the Bank does transfer your Personal Data to a third country, the Bank will make sure that your Personal Data is protected in the same way as if it was being used in the EEA. The Bank will apply one of the following bases:

- Transfer it to a third country with privacy laws that give the same protection as the EEA, as certified by an adequacy decision of the European Commission.
- Transfer it to organisations that comply with binding corporate rules, or an approved code of conduct or certification mechanism that requires its protection to the same standards as applicable in the EEA.
- Put in place a contract with the recipient which includes the standard data protection clauses adopted by the European Commission or adopted by the supervisory authority and approved by the European Commission.
- Where the recipient in the third country has signed up to a code of conduct, which has been approved by a competent supervisory authority. The code of conduct must include appropriate safeguards to protect the rights of individuals whose Personal Data transferred, and which can be directly enforced.
- Where the recipient in the third country has a certification, under a scheme approved by a competent supervisory authority. The certification scheme must include appropriate safeguards to protect the rights of individuals whose Personal Data transferred, and which can be directly enforced.

You may learn more about these on the European Commission website [International dimension of data protection | European Commission \(europa.eu\)](https://ec.europa.eu/justice/data-protection/international-dimension-of-data-protection/).

In the case where none of those bases apply, your Personal Data may still be transferred to a third country under the following conditions/ derogations, where:

- you explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers due to the absence of an adequacy decision and appropriate safeguards;
- the transfer is necessary for the performance of a contract between you and the Bank, or the implementation of pre-contractual measures taken at your request;
- the transfer is necessary for the conclusion or performance of a contract concluded in your interest between the Bank and another natural or legal person;
- the transfer is necessary for the establishment, exercise or defense of legal claims;
- the transfer is necessary in order to protect the vital interests of the Data Subject or of other persons, where the Data Subject is physically or legally incapable of giving consent.

Where a transfer could not be based on any of the above, a transfer to a third country or an international organisation may take place only if:

- the transfer is not repetitive,
- concerns only a limited number of Data Subjects,
- is necessary for the purposes of compelling legitimate interests pursued by the Bank which are not overridden by the interests or rights and freedoms of the Data Subject, and
- the Bank has assessed all the circumstances surrounding the data transfer and has on the basis of that assessment provided suitable safeguards with regard to the protection of Personal Data.

In such a case the Bank shall inform the supervisory authority of the transfer and the relevant persons whose Personal Data will be transferred on the fact of the transfer and the compelling legitimate interests pursued.

6.1 Cloud Services

The Bank uses cloud technology to store your Personal Data referred to under section 3 above. The cloud service providers used by the Bank and their data centers, are located in the European Union and thus bound by the GDPR requirements.

Despite this, there are cases where Personal Data may be transferred to or accessed from a third country for the purposes of the provision of the services outsourced or, if required by law. In such case the Bank shall ensure that the relevant safeguards as mentioned in section 6 above will apply.

The Bank ensures contractually that the cloud service provider will apply principles of data minimization and will not use or otherwise process your Personal Data for: (a) user profiling, (b) advertising or similar commercial purposes, or (c) market research aimed at creating new functionalities, services, or products or (d) any other purpose, unless such use or Processing is in accordance with Bank's documented instructions.

In case where special categories of Personal Data (Personal Data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation) will be transferred on cloud, the Bank will notify the Commissioner for Personal Data Protection prior to such transfer if required by the applicable regulatory framework i.e. when the cloud service provider transfers the special categories of Personal Data to a third country.

Retention of Personal Data on cloud shall be in line with the general retention policy of the Bank as described in section 7 below.

You may still exercise your rights as disclosed in section 9 below in relation to this Processing activity.

7. For how long your Personal Data is retained by the Bank

(a) Existing relationships

The Bank processes and stores your Personal Data as long as you are a customer of Bank and/or you maintain any type of relationship with Bank and such Processing is necessary for the performance of the Bank's contractual obligations, including the period prior to the conclusion of the contract with you (i.e., pre-contractual arrangements) and other legal obligations.

(b) Terminated relationships

After you stop being a customer of the Bank or you stop maintaining any type of relationship with the Bank, the Bank may keep your Personal Data for a period of up to 10 (ten) years from the date of termination for the following reasons:

- To maintain records according to rules that apply to the Bank such as under applicable tax, banking and money laundering laws and regulations.
- To respond to any questions or complaints.
- To demonstrate if needed that the Bank treated you fairly.
- To preserve evidence that may be needed for the establishment, exercise or defence of legal claims.

It is clarified that if the Bank holds your Personal Data because you are related to a customer of the Bank (e.g., you are a representative, beneficial owner, officer or guarantor), the Bank may keep your Personal Data for any of the above reasons for up to 10 years after the end of the relationship of the Bank with the relevant customer.

We may keep your Personal Data for longer than the said period:

- If we cannot delete it for legal and/or regulatory and/or technical reasons. If we do so, we will ensure that your privacy is protected, and the Personal Data is used only for the purposes stated in paragraph 4 above. For example, by the expiration of the above period, there are on-going judicial proceedings with the Bank concerning you directly or indirectly. In such a case the above period for the retention of the Personal Data will be extended until a final judicial decision is issued.
- For research or statistical purposes. If we do so, the Bank will make sure that your privacy is protected, and your Personal Data is processed only for research or statistical purposes.

(c) Prospect Customers

In case you provide us with Personal Data for the purposes of becoming a customer of Bank but for any reason whatsoever you do not become a customer, we shall keep your personal information for a period of up to 6 (six) months from the date of notification of the rejection of your application for banking services and/or credit facilities, or from the date of withdrawal of such application, in accordance with directives/guidelines issued by the Cyprus Commissioner for the Protection of Personal Data.

(d) Other provisions

In all respects, where a shorter or longer time period for the retention of Personal Data is provided for by law or regulatory acts, the retention period mentioned above will be reduced or increased accordingly.

8. Consequences for refusal to provide your Personal Data

Kindly note that if you do not provide us with the Personal Data which is legitimately required, then we will not be allowed / or be able to commence or continue our business relationship with you or another relevant person.

9. Your Rights

Your data protection rights, granted by the GDPR, are described below. You may exercise them at any time in any of the following ways:

- by calling the Bank's Service Line (local number: 8000 9999 or, if calling from abroad, +357 22 500 500);
- through the Bank's online banking service (bank mail); or
- submitting your request in any of the Bank's branches.

(a) Right to access Personal Data

You have the right to obtain from the Bank confirmation as to whether or not your Personal Data is being processed and/or obtain access to your Personal Data held by the Bank.

(b) Right to rectification of Personal Data

You have the right to question any Personal Data the Bank holds about you that you think is wrong or incomplete. If you do, the Bank will take reasonable steps to check its accuracy and correct it.

(c) Right to erasure (“right to be forgotten”)

You have the right to have the Bank delete or remove your Personal Data in the following circumstances:

- The Processing of the Personal Data by the Bank is no longer necessary for any of the reasons the Personal Data was collected and used.
- You have withdrawn your consent and there is no other reason for the Personal Data Processing.
- You have successfully objected to the Processing of the Personal Data by the Bank.
- The Personal Data has been unlawfully processed.
- Deletion is required by law.

It is clarified that the Bank reserves its right to deny the said erasure, if the Processing is necessary for the Bank to comply with its legal obligation, for reasons of public interest and/or for the exercise of its legal claims.

(d) Right to restriction of Processing of your Personal Data

You also have the right to restrict the Bank's use of your Personal Data in the following circumstances:

- pending verification by the Bank of Personal Data the accuracy of which you have contested
- the Processing is unlawful, but you do not want your Personal Data to be erased
- the Bank no longer needed the Personal Data, but you do not want it to be erased because you need it for the establishment, exercise or defence of legal claims
- pending the Bank's assessment where you have objected to Processing intended to safeguard the Bank's legitimate interests.

(e) Right to data portability

You have the right to receive your Personal Data from the Bank in a structured, commonly used and machine-readable form. You can also ask the Bank to transfer your Personal Data in this format to other organisations, where this is technically feasible. This right relates to the Personal Data which you have provided to the Bank and which the Bank processes electronically in reliance on your consent or for fulfilling the contract between you and the Bank.

(f) Right to object

You have the right to object to the Bank's use of your Personal Data and ask the Bank to stop using your Personal Data in any of the following circumstances:

- You have the right to object, on grounds relating to your particular situation, at any time to Processing of your Personal Data which is intended by the Bank to safeguard its legitimate interests or to serve the public interest. If you lodge an objection, the Bank will no longer process your Personal Data unless the Bank can demonstrate compelling legitimate grounds for the Processing which override your interests, rights and freedoms or unless the Processing is for the establishment, exercise or defence of legal claims.
- You have the right to object to the Processing of your Personal Data for direct marketing purposes, including profiling. If you lodge such an objection, your Personal Data will no longer be processed for such purposes.
- You have the right to object to the Processing of your Personal Data for scientific or historical research purposes or statistical purposes, on grounds relating to your particular situation, unless the Processing is necessary for the performance of a task carried out for reasons of public interest.

(g) Right to withdraw your consent

Where the Bank relies on your consent for the Processing of your Personal Data, you can withdraw your consent at any time. If you withdraw your consent, the Bank may not be able to provide certain products or services to you. If this is so, the Bank will tell you before giving effect to your withdrawal notification.

Please note that the withdrawal of the consent does not affect the legality of the Personal Data processed prior to the withdrawal.

10. Filing a complaint

If you are unhappy with how the Bank processes your Personal Data, please inform the Bank in any of the following ways:

- by calling the Bank's Service Line (local number: 8000 9999 or, if calling from abroad, +357 22 500 500);
- through the Bank's online banking service (bank mail); or
- submitting your request in any of the Bank's branches.

You also have the right to complain to the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus. You can find information regarding the filing of complaints on the relevant website (<http://www.dataprotection.gov.cy>).

11. Changes / Amendments to the Privacy Notice

This Privacy Notice sets out the information that the Bank must provide to you for the purposes of the GDPR. Any information in relation to the Processing of Personal Data that is included in any of the Bank's existing circulars, manuals and associated forms on matters which are covered by this Privacy Notice are deemed to be superseded by the information in this Privacy Notice.

The Bank may revise or update this Privacy Notice from time to time. The new version of this Privacy Notice will be available on the Bank's website.

In case of significant changes (such as in relation to the reasons for which the Bank uses Personal Data or to the way in which you may exercise the rights described above), the Bank will bring these changes to your attention.