

ATTICABANK PROPERTIES SA

INFORMATION FOR ATTICA BANK PROPERTIES SA's CLIENTS WITH REGARD TO THE PROCESSING OF THEIR PERSONAL DATA PURSUANT TO REGULATION (EU) 2016/679 AND THE RELEVANT GREEK LEGISLATION

ATTICABANK PROPERTIES SA, having its registered office in Athens, on 8 Omirou str., (tel. 216 00 28 332) (hereinafter “**Company**”), informs its clients (hereinafter “**Clients**” or “**Client**”), pursuant to Regulation (EU) 2016/679 and the relevant provisions of the applicable Greek legislation on personal data protection, in its capacity as controller, that Attica Bank Properties SA or third parties, on its instructions and on its behalf, shall process their personal data, pursuant to the following:

1. What personal data do we collect and where from?

a) Your identification data: name and surname, father's name, mother's name, ID card no., Tax Identification Number, AMKA no., gender, nationality, date and place of birth, etc.

These data are collected directly from you or/and publicly accessible sources or/and publicly accessible social networks.

b) Your contact data: address and email, phone number and mobile number, etc.

These data are collected directly from you or/and publicly accessible sources or/and social networks and from companies notifying debtors (Law3758/2009), claims management companies (Law4354/2015) or lawyers and law firms.

c) Data concerning your financial and property status, profession, etc.

These data are collected directly from you or on your instructions from publicly accessible sources, such as land ownership records and registers offices, etc.

d) Data related to your health or/and your family's dependent members' health submitted to the Company by you, at your own initiative.

e) Data regarding your failure to meet your financial obligations.

The Company collects these data in the context of your transactions with it from financial behavior data records or publicly accessible sources, such as Courts, etc.

f) Data regarding your knowledge about the investments sector, your financial situation, which are collected directly from you.

g) Image data from video surveillance systems installed in the Company's facilities where there are relevant information signs pursuant to the law.

It is noted that, with the exception of your data mentioned under points (a) and (b), which are absolutely necessary for every transactional or contractual relationship between you and the Company, the rest of the data collected depend, in any case, on the type of the contract that will be concluded or has been concluded with the Company, or/and the product or service offered.

2. Why do we collect your personal data and how do we process them?

Your aforementioned personal data (Chapter 1) that are collected are processed for the purposes of the Company's compliance with the obligations arising from the legal, regulatory and supervisory framework in force, and the decisions of any public Authorities or courts, and for the defense of the Company's rights and the fulfillment of the Company's legal interests, as set out in detail below:

a) Data mentioned under points (a) and (b) above for the purposes of identifying and contacting you during the pre-contractual and contractual stage, of the execution and smooth operation of the contract and the fulfillment of our obligations to you arising from it.

b) Data for the purposes of the fight against money laundering and terrorist financing and the prevention of fraud against the Company, as a member of Attica Bank Group, or other clients thereof, such as any other illegal action. To this end, automated systems and relevant models are used in accordance with the relevant international standards.

c) Data for transactions security and the protection of property, safety and physical integrity of employees, Clients or visitors of the Company.

d) The aforementioned data in order to inform you both about the best utilization of the products or/and services that we offer to you and about products offered by the Company and the Group companies in addition to those that you already use, or offered by companies who collaborate with the Company, followed or not by the drafting of a transactional profile with the use of the appropriate models (provided that you have consented to this, where required), and to send you client satisfaction questionnaires regarding products and services offered by the Company and the level of Client service.

3. Whom do we transfer your personal data to?

Your personal data may be transferred to the following persons:

a) To Company employees responsible for evaluating your requests, managing the operation of the contract/-s between you and the Company, fulfilling any obligations arising from it/them and the relevant obligations under the law.

b) To bodies to whom the Company may assign the execution of specific works on its behalf (processors), such as companies notifying debtors (Law3758/2009), claims management companies arising from loans and credits (Law4354/2015), lawyers, law firms, notaries public and process servers, experts, natural or legal persons, as well as data processing companies for the purposes of

controlling and updating data (including updating your contact data in the event that you have not notified the Company about the change), re-assessing risk, categorizing contracts and debts arising from them, processing of debt management, etc., on behalf of the Company, and IT applications maintenance services providers, provided that secrecy is always respected.

c) To credit or/and financial institutions, having their registered office in Greece or abroad, that have obtained the required operation license and operate legally, as well as companies or special purpose vehicles, as defined in Law 3156/2003 on securitization of receivables, as in force.

d) To credit acquisition firms under Law 4354/2015, as in force, and bodies operating in the wider financial sector, including Greek and foreign investment companies, in the event of the concession of claims arising from loan agreements.

e) To companies of the Company Group's financial sector for the purposes of assessing the total risk assumed, complying with supervisory obligations and a unique treatment of the Group's clients.

f) To any supervisory, independent, judicial, public or/and other Authorities within the framework of their powers.

g) To co-financing or guarantee-issuing bodies, as the case may be, such as the ETEAN, the Greek State, etc.

h) To companies processing your data on behalf of the Company for the purposes of product or/and services promotion.

4. Transfer of your personal data to third countries outside the EU.

We may transfer your personal data to third countries, outside the EU, in the following cases:

a) In the event that a European Commission implementing act has been issued regarding the adequate level of data protection in this country, or

b) in the event that you have given the Company your explicit consent, or

c) in the event that the transfer is required for the execution of a contract with you (e.g. execute an order regarding a transfer to a bank account in a credit institution in a third country), when any of your personal data that are required to this end shall be transferred to the bodies mandatorily involved (e.g.

d) in the event that the Company is required to do so pursuant to any provisions of the law or transnational agreement or judicial decision, or

e) for the purposes of the Company's compliance with the rules of automatic exchange of information in the field of taxation, as these result from Greece's international obligations, or

f) provided that such transfer is necessary so that the Company may establish or exercise its rights or protect its interests.

It is noted that in order to fulfill the aforementioned obligations mentioned under points (d) or (e) in particular, we may transfer your personal data to competent national Authorities so that they may forward them to the corresponding third country Authorities.

5. How long will we keep your personal data?

In the event that a contract is concluded with the Company, your personal data will be kept until the general limitation period pursuant to the law is completed, i.e. for a period up to twenty (20) years as from the expiry of the relevant contract in any way whatsoever.

If, until the expiry of twenty (20) years, any legal proceedings involving the Company or any affiliated company and relating to you directly or indirectly are in progress, the said period for which your data will be kept shall be extended until an irrevocable judicial decision is issued.

In the event that no contract is concluded with the Company, your data will be kept for five (5) years as from the date that the relevant application was rejected.

In the event that a smaller or greater period of keeping your personal data is provided for by the law or any regulatory acts, the said period for which your data will be kept shall be reduced or increased accordingly.

Any documents signed by you and containing your personal data may, at the Company's absolute discretion, be kept in electronic/digital format after five (5) years.

6. What are your rights regarding the protection of your personal data and how can you exercise them?

l) You have the following rights regarding the protection of your personal data:

a) To know what personal data we keep and process, the origin thereof, the purpose of the processing thereof, the recipients thereof and the period of keeping them (right to access).

b) To request the rectification or/and completion of your personal data so that they are complete and accurate (right to rectification). In these cases, you must provide all necessary documents proving the need for the relevant rectification or completion.

c) To request the restriction of processing of your personal data (right to restriction).

d) To refuse or/and to object to any further processing of your personal data kept by us (right to object).

e) To request the erasure of your personal data kept by us (right to be forgotten).

f) To request that your data kept by us are transferred to another controller of your choice (right to data portability).

The following is noted regarding your aforementioned rights:

- The fulfillment of your rights mentioned under points (c), (d) and (e), provided that they regard data necessary for the drafting or/and the continuation of the contract (contracts) operation, regardless of the source of collection thereof, shall mean the termination thereof ipso jure.
- In any case, the Company has the right to refuse to satisfy your request to limit the processing of your personal data or to erase them if the processing or keeping thereof is necessary for the establishment, exercise or defense of its legal rights or the fulfillment of its obligations.
- Exercising the right to portability (mentioned under point f above) does not lead to the erasure of your data from our records, which is subject to the terms of the previous paragraph.
- The exercise of the aforementioned rights shall produce effects for the future and does not affect any previously processed data.

g) To file a complaint with the Hellenic Data Protection Authority (www.dpa.gr), if you believe that your rights are infringed in any way whatsoever.

II) In regard to the exercise of your aforementioned rights and to any issue relating to your personal data, you can contact Atticabank Properties in writing at Omirou str., 10564, Athens, or by email at info@atticabankproperties.gr, or by phone at 216-0028332.

In these cases, we shall make all reasonable efforts to reply to your request within thirty (30) days as from the date it was filed. The aforementioned period may be extended by sixty (60) days, if it is deemed necessary at the Company's absolute discretion, taking into account the complexity of the request and the number of requests, in which case we shall inform you within the aforementioned period of thirty (30) days.

Exercising your rights does not entail any charge for you. However, where your requests are manifestly unfounded, excessive or have a repetitive character, we may ask you to assume the relevant cost about which we shall inform you or refuse to act on the requests.

7. How do we protect your personal data?

In order to ensure the safety of your data, the Company has in place and implements procedures and systems to safeguard the secrecy of your personal data and the processing thereof, and to protect them from any accidental or unlawful destruction, accidental loss, alteration, forbidden dissemination or access and any other form of unlawful processing, including systems of access controls, physical and logical security, Data Loss Prevention and back up outside the Company.

This information replaces any previous information regarding the processing of your personal data.