

## **ATTICA BANK SOCIETE ANONYME BANKING COMPANY**

### **INFORMATION TO SHAREHOLDERS OF ATTICA BANK SOCIETE ANONYME BANKING COMPANY ON THE PROCESSING OF THEIR PERSONAL DATA PURSUANT TO THE REGULATION (EU) 2016/679 AND THE RELEVANT GREEK LEGISLATION**

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ATTICA BANK SOCIETE ANONYME BANKING COMPANY, having its registered offices in Athens, on 23 Omirou str., (tel.: 210 3669000) (hereinafter "**Bank**"), in its capacity as data controller, would like to inform you, in your capacity as shareholders of the Bank, as pledgees, successors of shares and persons having a right to vote, pursuant to the Regulation (EU) 2016/679 and the relevant provisions of the applicable Greek legislation on personal data protection, that the Bank or any third parties, following its order and on its behalf, shall process their personal data as follows:

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

- a) Identification data: name and surname, father's name, mother's name, ID card, TIN, Social Security Number (AMKA), gender, nationality, date and place of birth, etc.
- b) Contact information: address and email, telephone and mobile number, etc.
- c) Number of shares.
- d) Bank account details.

The aforementioned data is collected either directly from you or from third natural persons authorized by you or from third legal persons related to you or from the company "Central Securities Depository S.A.".

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

The aforementioned personal data (Chapter 1) is processed so that the Bank may conform with any obligations imposed to it by the legal, regulatory and supervisory framework in force, as well as by the decisions of any public authorities or Courts, and in order to protect and fulfill the Bank's legal rights for the following purposes:

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- a) To identify you.
- b) To contact you.
- c) To verify your capacity of exercising your rights as shareholders of the Bank, and the legality of such exercise, pursuant to Law 2190/1920 on societe anonyme companies, as in force (participation in the Bank's General Meetings and exercise of voting rights therein, registration in the Book of Shareholders, fulfillment of the Bank's legal obligations, etc.).
- d) So that the Bank may fulfill its obligations against you, in your capacity as shareholders of the Bank (e.g. payment of dividends).

### **3. Whom do we transfer your personal data to?**

Your personal data may be transferred to the following persons:

- a) To the Bank's Administration or/and the Bank's employees who are responsible for identifying you and verifying the legality of your exercising of your rights as shareholders of the Bank.
- b) To lawyers, law firms, process servers, experts, in the event of any judicial actions regarding the capacity of shareholder of the Bank, or in the event of any preliminary inquiries or inquiries or criminal proceedings regarding your aforementioned capacity in any way whatsoever.
- c) To natural persons and companies that process data in order to control and update it (including update of your contact details, in case you omitted to notify the Bank about any modification thereof), as well as providers of maintenance services for IT applications, provided that confidentiality is observed at all times.
- d) To the company "Central Securities Depository S.A.".
- e) To any supervisory, independent, judicial, public or/and other authorities, within the framework of their powers.
- f) To other shareholders and employees of the General Meeting.

### **4. Transferring your personal data to third countries, outside the EU**

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

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following occasions:

- a) Provided that the European Commission has issued an executive act on the adequate level of the protection of personal data in such country, or
- b) provided that you have given your explicit consent to the Bank, or
- c) provided that the Bank is obliged to do so pursuant to any provision of the law or inter-state convention or judicial decision, or
- d) within the framework of the Bank's conformance with the regulations on automatic exchange of information in tax matters, as results from Greece's international obligations (e.g. FATCA), or
- e) provided that such transfer is necessary so that the Bank may establish or exercise its rights or protect its interests.

It is noted that for the purposes of conforming, in particular, with the aforementioned obligations under (d) or (e), we may transfer your personal data to the competent national authorities so that the latter may transfer it to the relevant authorities of third countries.

#### **5. How long do we keep your personal data?**

Your personal data shall be kept for as long as you are shareholders of the Bank.

In the event that you lose your capacity of shareholder for any reason whatsoever, your data shall be kept until the validity of claims expires under the law, i.e. for a period of up to twenty (20) years from the date when you ceased to be a shareholder of the Bank in any way whatsoever.

If any judicial proceedings involving you and the Bank are in progress when the aforementioned period of twenty (20) years expires, your data shall be kept until an irrevocable judicial decision is issued.

#### **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:

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a) To know what personal data we keep and process, the origin thereof, why it is processed, the receivers thereof, as well as the period for which it is kept (right of access).

b) To request the rectification or/and the completion of your personal data, so that it is full and accurate (right to rectification). In these cases, you must provide all necessary documents that prove that such rectification or completion is necessary.

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

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

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

The following is noted regarding your aforementioned rights:

- The Bank has the right, in any case, to refuse to satisfy your request regarding the restriction of processing or the deletion of your personal data, if the processing or keeping thereof is necessary in order for you to continue being a shareholder of the Bank, to exercise your rights as a shareholder of the Bank, as well as in order for the Bank to establish, exercise or defend any of its legal rights or to fulfill its obligations against you as shareholders of the Bank.
- The exercise of the aforementioned rights applies to the future and not to any already processed data.

f) To file a complaint with the Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)), if you believe that your rights are infringed in any way whatsoever.

II) You can contact the Bank in written regarding the exercise of your aforementioned rights, as well as any matter about your personal data, to the following address: Attica Bank, 23 Omirou str., 10672 Athens, Data Protection Office, or via e-mail to [dpo@atticabank.gr](mailto:dpo@atticabank.gr).

In these cases, we shall make all reasonable efforts to answer to your request within thirty (30) days from the date of submission thereof. Such period may be extended by sixty (60) more days, if the Bank deems it necessary, at its absolute discretion, taking

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into account the complexity of the request and the number of requests; in this case, we shall inform you in written within the aforementioned period of thirty (30) days.

Exercising your rights does not entail any charge for you. However, if your requests are manifestly unfounded, excessive or repeated, we can either ask you to assume any relevant cost after we inform you about it or refuse to answer them.

## **7. How do we protect your personal data?**

In order to keep your data safe, the Bank has in place and implements procedures and systems, including access controls, physical and logical security systems, Data Loss Prevention systems and back up outside the Bank, regarding the confidentiality and processing of your personal data, as well as the protection thereof from any accidental or unlawful destruction, accidental loss, alteration, forbidden diffusion or access and any other kind of unlawful processing.

The above information supersedes all previous information regarding the processing of your personal data.

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