

## Providing Optima bank S.A. customers with information on the processing of personal data in accordance with the General Data Protection Regulation [Regulation (EU) 2016/679] and the national data protection legislation in force

Optima Bank SA (hereinafter the “Bank”), in its capacity as controller and with a sense of respect and responsibility for the security of your personal data (hereinafter “Data”), would like to inform you as Bank shareholders, pledgee-lenders, heirs of shareholders and holders of voting rights, in accordance with Regulation (EU) 2016/679 (hereinafter the “Regulation”) and the relevant provisions of the Greek data protection legislation in force, that the Bank or third parties acting upon orders from, or on behalf of, the Bank will process your Data as follows:

### 1. Categories of Data collected by the Bank, and origin thereof

The Data collected and processed by the Bank may be as follows and may not be related to you in their entirety:

- (a) Identification data: name, surname, father's name, mother's name, identity card or passport number, tax identification number (TIN), nationality, date and place of birth, etc.
- (b) Contact details: postal and e-mail address, contact telephone (landline and/or mobile), etc.
- (c) Image and audio data: photographs, videoclips of Bank events and actions in which you take part, etc.

The above Data are collected either directly from you, or from third natural and/or legal persons which are legally authorised by you or associated with you, or directly from the Bank.

### 2. Why we collect and process your Data

The Bank processes the above Data (referred to in Chapter 1 hereof) to comply with its obligations imposed by or deriving from the legal, regulatory and supervisory framework in force from time to time and any supervisory authority decisions and court judgments, to fulfil its obligations to you as shareholders, to protect its rights and to secure its legitimate interests, with a view to serving the following purposes:

- (a) Identification
- (b) Communication
- (c) Verification of the possibility and legality of the exercise of your rights as Bank shareholders in accordance with the provisions of Law 4548/2018 on reforming the law on public limited companies, as in force from time to time, in particular participation in the General Meetings of Bank Shareholders, exercise of voting rights, enrolment in the shareholder registry, etc.
- (d) Fulfilment of the Bank's obligations to you as shareholders, in particular payment of dividend
- (e) Promotion of the Bank's activity and corporate profile in the media and on social networks

As regards the potential processing of your image and audio data [referred to in Chapter 1(c) above] with a view to promoting the Bank publicly, your participation in events and/or actions constitutes *de facto* consent to the processing of those Data in order to serve the above-mentioned purpose.

### 3. Recipients of your Data

The recipients of your Data may be, in particular, the following persons and authorities:

- (a) The Bank Management and/or its employees, agents and partners, under any contractual relationship with the Bank, who are responsible for identifying you and verifying the legality of the exercise of your rights as Bank shareholders
- (b) Lawyers, law firms, bailiffs, experts, etc. for actions relating to your capacity as Bank shareholders
- (c) Companies engaging in the storage, archiving, management and destruction of files and data, providers of IT services and IT system maintenance services, teleconference service providers, electronic communications service providers, cloud computing service providers, information society service providers, and postal service providers
- (d) Supervisory, independent, judicial, prosecutorial, police, tax, public and/or other authorities or bodies, accredited intermediaries and mediation service centres, arbitration courts and alternative dispute resolution bodies, within the scope of their functions
- (e) Certified auditors and audit firms, in the context and for the purpose of providing audit and advisory services to the Bank.

### 4. Transmission of your Data to third (non-EU) countries

The Bank may transmit your personal data to third countries or international organizations outside the EU provided that:

- (a) an adequate level of data protection is ensured in accordance with a relevant act of the European Commission by the third country or international organization concerned; or
- (b) appropriate guarantees have been provided for the processing of those Data in accordance with Union and/or national legislation.

In the absence of the above, the Bank shall transmit your Data if:

- (c) you have given your explicit consent; or
- (d) transmission is necessary to establish, exercise or support its legal claims; or
- (e) it is required to do so in order to comply with its obligations under the legislation or international conventions.

### 5. Period of retention of your Data

Your Data will be retained for as long as you are Bank shareholders. More specifically, image and audio data [referred to in Chapter 1(c)] shall be retained for a period of one (1) year from the date of collection thereof. Data included in the shareholder registry and the Bank's corporate documents (in particular in the minutes of General Meetings of Shareholders, etc.) will be retained in accordance with the legal and/or regulatory framework in force throughout the required duration.

If you forfeit your capacity as a shareholder due to any cause whatsoever, your Data will be retained until completion of the statutory limitation period for claims, i.e. a period of up to twenty (20) years from forfeiture.

If there are any judicial proceedings in progress at the end of the above period, the Data retention period will be extended until an irrevocable court judgment is handed down.

The Bank keeps a historic record of the persons who have influenced its course and/or the economy of Greece. In connection with that purpose, very few of your Data (in particular your name and surname) may be included in our historic record and retained for as long as that record exists.

## 6. Your Data protection rights

You have the following rights to protect your Data which we process:

- (a) To be informed of the categories of your Data, their origin, their processing purposes, the categories of recipients thereof and the period of retention thereof (Right of Access).
- (b) To request that your Data be rectified and/or supplemented, so that they are complete and accurate (Right to Rectification). In that event you will have to provide us with any documents required to substantiate the need to rectify and/or supplement.
- (c) To request that your Data be erased (Right to be Forgotten).
- (d) To request that the processing of your Data be restricted (Right to Restriction of Processing).
- (e) To oppose any further processing of your Data (Right of Objection).
- (f) To request that your Data be transmitted to such other persons and organisations as indicated by you (Right to Data Portability).
- (g) To withdraw your consent at any time in cases where that consent is necessary for processing your Data.
- (h) To lodge a complaint with the Hellenic Data Protection Authority, if you feel that your rights referred to in points 6(a) to (g) above are being infringed in any way whatsoever. If you have any questions regarding the Authority's competence and how to lodge a complaint, please visit its website ([www.dpa.gr](http://www.dpa.gr)).

Following are some indicative points in relation to your above rights:

The Bank has, in any event, the right to refuse to grant your request to restrict the processing of, or erase, your Data if the processing or retention of the Data is necessary for its historic record (referred to in Chapter 5), for establishing, exercising and supporting its legal rights and interests, for complying with its obligations under the law, as well as for you to unhinderedly exercise your rights as Bank shareholders.

The exercise of the right to data portability does not entail erasure of the Data from Bank records, which is subject to the conditions laid down in the previous paragraph.

The exercise of the above rights applies to the future and is not related to Data processing already carried out.

## 7. How to exercise your rights

With regard to the exercise of your above rights and any issue related to the Data kept and processed by the Bank in connection with your capacity as Bank shareholder, you may contact the Data Protection Officer of the Bank in writing by sending a postal letter to the Bank headquarters address 32 Aigialeias St. &

Paradeisou St., 151 25 Marousi, Attica, to the attention of the Data Protection Officer (DPO), or by sending an e-mail to [dataprotection@optimabank.gr](mailto:dataprotection@optimabank.gr).

The Bank will make all possible effort to respond to your request within thirty (30) days of its receipt. This period may be extended for an additional sixty (60) days, if this is deemed necessary at the absolute discretion of the Bank, taking into account the complexity of the request and the number of requests. The Bank shall, within thirty (30) days of receipt of the request, notify you if the deadline is extended. Exercising your above rights is free of charge for you. However, if a request is manifestly unfounded, excessive or recurring, the Bank may either charge you a reasonable fee, notifying you accordingly, or may refuse your request.

## 8. Protecting Your Data

To ensure the security and protection of your Data from accidental or unlawful destruction, loss, alteration, prohibited dissemination or access and any other form of unlawful processing, the Bank applies appropriate organisational and technical measures, while keeping its systems, policies and procedures up-to-date.

## 9. Amending this Communication

This Communication supersedes all previous communications provided to you on the processing of your personal data.

The Bank may update, supplement and/or modify this Communication in the future. In that event, a more recent version of the Communication will be posted in a special 'personal data processing' section of the Bank's website at <https://www.optimabank.gr/>.

## 10. Contact Details

(a) Data Controller

Optima Bank SA

32 Aigialeias St. and Paradeisou St.

15125 Marousi, Attica

Contact tel.: [+30 210 8173000](tel:+302108173000)

Website: <https://www.optimabank.gr/>

(b) Data Protection Officer

Optima Bank SA

32 Aigialeias St. and Paradeisou St.

15125 Marousi, Attica

Contact tel.: [+30 210 8173000](tel:+302108173000)

E-mail: [dataprotection@optimabank.gr](mailto:dataprotection@optimabank.gr)