

The Information for Customers of Optima bank S.A. on the Processing of Personal Data in accordance with the General Data Protection Regulation (GDPR).

Optima bank SA (hereinafter referred to as the "Bank"), based in Maroussi, Attica, at 32 Aigialeias & Paradissou Str. (www.optimabank.gr) in its capacity as Controller in accordance with the General Data Protection Regulation (EU) 2016/679 (hereinafter "GDPR") and the provisions of the national personal data protection legislation, as applicable, informs the natural persons (hereinafter referred to as "Customers") that the bank and / or third parties, on its mandate and on its behalf, process personal data in the context of a transaction for a product or service of the Bank; or transaction with the Bank in accordance with the following.

In particular, this is addressed to:

- Any natural person who, in any capacity, has trade relations with the Bank and
- Any natural person who, in any capacity, carries out any transaction with the Bank.

The processing of personal data (hereinafter referred to as "Data") shall include, but is not limited to, the collection, recording, organisation, structure, storage, change, retrieval, retrieval of information, use, transmission, restriction or erasure thereof.

This may be supplemented by more specific updates as applicable, such as in the case of personal data processing, collected through video recording systems.

1. Data that we process and their source

1.1 Categories of Personal Data

We collect and process, as a Bank, Data, which belong to the following categories:

- a) Identification data**, such as name, father's name, gender, copy of identity card (ID card) or passport, Tax Identification Number, Tax Office, date and place of birth, gender, nationality, etc. and other demographics.
- b) Communication data**, such as postal and electronic address of residence and work, landline and mobile phone numbers.
- c) Data on financial, property and family status**, such as occupation, income, dependent members, tax and income data (Clearance note, Forms E1 and E9), etc.
- d) Data relating to your creditworthiness, rating and financial behaviour**, such as debts to financial institutions from loans and credits, credit scoring, credit profiling.
- e) Data of default of your financial obligations**, such as termination of loan and credit agreements, seizures of bank accounts, uncovered checks, payment orders, seizures, applications or resolution and bankruptcy decisions.
- f) Data on your contracts for the acceptance and clearing of cards (acquiring)** that have been terminated by the credit institutions or card issuing and management companies cooperating with you for reasons that constitute a breach of the terms of the relevant contracts.
- g) Data on the operation of your contract and / or contracts** with the Bank and the use of the products and / or services provided to you or provided to you, including Data, resulting from documents submitted or sent to the Bank, either at a pre-contractual stage or during the contractual relationship or transaction.
- h) Data resulting from the performance of payment transactions and / or the use of payment services.**
- (i) Data relating to identity and transactional identifiers** provided by devices (e.g. mobile phones) linked to the Bank's systems or applications, such as an IP address **or other data provided through such devices as location and location identifiers, as well as Internet browsing data (cookies).**

j) **Data on your knowledge and experience in the investment sector**, your financial status, including your ability to suffer losses, your level of tolerance to the risks of the investment, your investment objectives and your needs.

k) **Data relating to or resulting from the realisation of investment transactions and / or the acquisition of investment products by you and the provision of investment services to you. Also, Data of the funds and financial instruments held by you**, acquired through the Bank and / or those held at the Bank, in the context of the applicable legislation.

l) **Image data from the video recording systems of the Bank's premises**, where the relevant legal notices and / or updates are available.

m) **Data relating to telephone conversations and / or video calls (video conferences)**, which are recorded in accordance with the legal requirements.

n) **Data of your responses to the Bank's surveys and / or your response to its promotional actions, provided they are not anonymous data.**

o) **Special categories of Data**, such as biometric data relating to the characteristics of the handwritten signature, placed on electronic media by means of a special pen (e.g. tablet), selfie photo, submitted in the context of the remote identification process for the initiating of cooperation with the Bank (digital onboarding) and / or the provision of its products and services, your health data and / or of the dependent members of your family, provided that the relevant legal conditions are met, in particular the provision of consent either explicitly or with direct action. **It is noted that when you choose to access the Bank's electronic banking system from your mobile device through the relevant application (mobile application) through the use of the fingerprint selected by you for this purpose on a fingerprint sensor (one touch sensor), the Bank only receives the result from that sensor, without proceeding to any processing of your data.**

p) **Data on the risk assessment of money laundering and / or terrorist financing.**

q) **Data on the exchange or provision of financial information** required by the regulatory framework (e.g. CRS-Common Reporting Standard, FATCA- Foreign Account Tax Compliance Act).

r) **Data relating to transactions on financial instruments referred** to in the context of compliance with applicable legal or regulatory provisions (e.g. Regulation (EU) 648/2012 (EMIR), Regulation (EU) 600/2014 (MiFIR).

s) **The approved electronic signature certificate in accordance with Regulation (EU) 910/2014 (eIDAS)**, as applicable.

It is noted that, with the exception of the Data categories under (a) and (b), which are absolutely necessary for any transactional and / or contractual relationship with the Bank, the type and number of other categories, which it collects and processes itself, depends on the type of the contractual relationship and / or transaction, the offered or provided product and / or service and the capacity in which the natural person contracts or trades.

1.2 Data Source

The Data may be collected by physical presence and / or electronically, directly from you or third parties, acting on your behalf, or from databases with or without your relevant mandate / authorisation (e.g. eGov-KYC of the General Secretariat for Information Systems, e-EFKA of the National Social Security Institution, etc.) or by the Bank itself in the context of its work and obligations, in particular from the following sources:

a) Publicly accessible sources (e.g. Courts, Independent Authorities, Land Registries, Cadastral Offices / Land Registry Offices, freely accessible social media, etc.).

b) Group companies with which you cooperate.

c) Alternative electronic banking networks (e.g. web-banking, mobile-banking).

d) Alternative communication channels (e.g. Bank website).

- e) Recording systems and electronic devices of the Bank.
- f) Associated Representatives and / or service providers and / or associates of the Bank (in particular lawyers, law firms, bailiffs, notaries, Debtor Information Companies of Law 3758/2009, Companies for the management of claims from loans and credits of Law 4354/2015).
- g) The Societe Anonyme under the name "BANK INFORMATION SYSTEMS SA" and the trade name "TIRESIAS SA", which is based at 2 Alamanas Street, 15125 Maroussi. For detailed information regarding the Systems of TIRESIAS SA and the processing of personal data carried out, as well as for the exercise of your related rights, you can directly contact the above Company (210-3676700, www.tiresias.gr).

It is noted that in the context of your transactional or contractual relationship with the Bank you may provide us with the data of third parties; in this case, as you have previously informed them, in particular by referring them hereto and they have explicitly agreed, if required.

2. Lawful bases and purposes of processing of your Data

The Data collected by the Bank as above are each time necessary in relation to the purposes for which they are processed, as they are indicated and not limited to the following under 2.2. **Any objection to the provision or processing of Data may lead to the inability to initiate a relationship or to continue your transaction with the Bank as the Data and processing thereof is necessary for the conclusion of a banking transaction and the conduct of banking transactions, for the purposes listed in 2.2. below.**

2.1 Lawful bases

- a) The execution of a contract, which you have concluded with the Bank or the implementation of actions and taking measures at your request at a time before the conclusion of the contract.
- b) The compliance of the Bank with decisions of Authorities and / or Courts and obligations arising from the law and the regulatory, supervisory framework governing the operation of the financial system.
- c) The fulfillment of a duty, performed in the public interest.
- d) The pursuit and / or defence of legal interests of the Bank or a third party.
- e) Your consent, if the processing is not based on any of the above mentioned under 2.1 (a-d) processing bases or is specifically required by a legislative provision. Please note that you have the right to withdraw your consent at any time without prejudice to the lawfulness of the processing based such consent until its withdrawal and in accordance with your rights under the following Chapter 7.

2.2. Purposes of Processing

The Bank processes Data for purposes, relating in particular, to the following:

- Your identification and communication with you both at the stage of your pre-contractual and contractual relationship and any other transaction or cooperation with the Bank.
- The remote electronic identification and initiation of your transactional relationship (digital on boarding) through video call and live conversation (video conference) with our authorised representative.
- The examination and evaluation of your requests, the preparation and execution of a contract between us, the fulfillment of obligations of both parties, the defence of interests and the exercise of its rights.
- Proof of the preparation and operation of the contracts and their safety.
- The servicing, support, execution and monitoring of your transactions including transactions through alternative electronic banking networks.
- The provision of products and / or services including investment products and services.

- Your information about products and / or services that you already have and enjoy, in particular about the features, characteristics, functionalities, opportunities for use and developments.
- Your notification for participation in reward programs, draws, competitions of the Bank and your award as a winner.
- The investigation of your degree of satisfaction with the Bank's provided service and its products and / or services and the design and availability of new ones.
- The promotion of new products and / or services of the Bank, the companies of the Group and / or companies cooperating with the Bank or third parties, which match your trading habits and interests. It is noted that the promotions to legal entities are not occupied by the present but are exclusively governed by the applicable provisions of the legislation on non-requested communication of Law 3471/2006, as applicable.
- Its compliance with obligations imposed by the applicable legal, regulatory, supervisory framework and the decisions of authorities (e.g. administrative, independent, prosecutorial, etc.) and / or Courts.
- The provision of payment services and the prevention and suppression of money laundering and terrorist financing, as well as the prevention, detection and suppression of fraud against the Bank, the companies of the Group or its Customers, as well as any other illegal act.
- The management and treatment of risks, in particular those caused by malicious software of information systems, DDoS (Denial of Service) type attacks against the Bank, the companies of the Group or its Customers, as well as any other illegal act, including phishing incidents.
- The protection of the property, security and physical integrity of employees, Customers and / or visitors to its facilities.
- The defence of its legitimate interests in general, e.g. to claim its legitimate claims before competent judicial authorities or non-judicial / alternative dispute resolution agencies.

3. Profiling - Automated individual decision-making

3.1 Profiling

The Bank may proceed to the profiling of its Customers by combining Data, which it collects as above, for the following purposes:

- a) For promotional purposes, provided you have given your explicit consent. In this context, the Bank processes Data, such as those relating to your trading behaviour.
- b) For your classification as a private or business customer in accordance with the relevant legislation (in particular Directive 2014/65/EU (MiFID II) and its implementing national Law 4514/2018) and the assessment of your suitability and compatibility for the provision of investment services and / or products. In this context, the Bank processes Data such as those concerning your knowledge and experience in the field of investments.
- c) To assess the risk of money laundering and terrorist financing. In this context, the Bank processes Data such as identification, financial and property status, payment operations.

3.2 Automated individual decision-making

The Bank may make automated individual decision-making, including profiling, when:

- a) It is necessary for entering into, or performance of, your contract with the Bank.
- b) It is authorised by Union or national law.
- c) You have given your explicit consent.

The above processing, serves the following purposes in particular:

Optima bank S.A. Regulated by the Bank of Greece License No: 52/2/17.12.99
Registration Number of Hellenic Business Registry: 003664201000 • LEI Code: 2138008NSD1X1XFUK750
Tax Registration No: 099369013, Athens Tax Office for Societes Anonymes
32 Aigialeias Str & Paradiissou, 151 25 Maroussi • Tel. +30 210 81.73.000 • Fax. +30 210 81.73.101

- Assessment of credit risk in cases of approval or rejection of an application for a loan or credit application, an application for an increase in the credit limit, an application for debt settlement, etc., after processing financial and asset data, default of obligations, credit rating and transactional behaviour.
- Assurance and reliability of the services provided by the Bank (e.g. investment services and / or products).
- Monitoring and prevention of fraud against you or the Bank or a third party (e.g. malicious credit card debit, irregular transaction in a bank account).

In the cases of processing of your Data as above, the Bank shall apply appropriate measures and guarantees to protect your rights, freedoms and legitimate interests, in particular by requesting a review of your rejected application with human intervention in accordance with your rights under the following Chapter

4. Recipients of your Data

If at least one of the legal bases for the processing of the Data is in force and in order to serve their respective processing purposes as above, the following may be the recipients of the data:

- a) The employees and members of the Management of the Bank in the context of their duties and powers.
- b) Group companies for the purposes of assessing the overall risk, response to supervisory obligations and your integrated management and service.
- c) Natural and / or legal persons to whom the Bank has entrusted the execution of specific tasks on its behalf, which are committed both in respect of professional secrecy and in terms of confidentiality and privacy, including but not limited to, the following:
 - Debtor information companies (Law 3758/2009) and companies for the management of claims from loans and credits (Law 4354/2015).
 - Call management companies (call centers).
 - Database management companies and companies digitizing, storing, managing and destroying files and data.
 - Market research and customer satisfaction companies, advertising and promotion of products and / or services.
 - Companies providing consulting services.
 - Companies providing specialised payment services.
 - Companies providing risk management, fraud prevention and cybersecurity services.
 - Companies providing services for issuing and sending account statements.
 - Companies participating in reward or loyalty programs to provide you with benefits from these programs.
 - Companies providing services for the development, maintenance, support of information systems and IT applications.
 - Companies providing e-mail services, Internet hosting services, including cloud services.
 - Companies providing remote services for electronic identification, verification and validation of the authenticity of the submitted documents at the beginning of the remote trading relationship with the Bank in accordance with the applicable legal framework.
 - Information Society services companies (e.g. electronic platforms for mass messaging).
 - Communication data and / or asset research companies.
 - Virtual Data Room (VDR) service providers to support and facilitate the management / access to loan portfolios.
 - Natural or legal persons providing security and guarding services.

- Natural or legal persons who process Data for the purpose of updating such data, including the update of the Communication Data in case you have failed to notify the relevant change to the Bank.
- Lawyers, law firms, notaries and bailiffs.
- Intermediaries of Law 4640/2019, as applicable, as well as organisations providing intermediation and arbitration services (e.g. EODID).

d) Credit and / or financial institutions and / or financial institutions based in Greece or abroad, which have been licensed and operate lawfully, payment institutions, electronic money institutions, payment service providers or entities that are obliged to intervene for the execution of a contract or transactions (SWIFT, SEPA, VISA, MASTERCARD, DIAS SA etc.) as well as financial technology companies (fintech).

e) Companies acquiring claims under Law 4354/2015, as applicable, as well as entities of the wider financial sector, including domestic and foreign investment companies, in case of transfer of claims arising from grant contracts and companies or special purpose vehicles within the meaning of Law 3156/2003, as applicable, on securitization of receivables.

f) Supervisory, auditory, independent, tax, judicial, prosecutorial, police, public and / or other authorities and bodies within the framework of their statutory authorities and powers (e.g. the Bank of Greece, the Hellenic Capital Market Commission, the Authority for Anti-Money Laundering and Countering the Financing of Terrorism etc.).

g) "TIRESIAS SA" for the Data relating to the records kept by it, such as those relating to uncovered checks, unpaid bills of exchange, termination of loan or credit agreements or acceptance of cards as means of payment, loan agreements, credits, letters of guarantee and their development, guarantee contracts, termination of contracts with undertakings for the clearing of transactions through cards (acquiring), including Data for the purposes of the file "Tiresias Risk Control System" (TSEK).

h) Entities for the financing, co-financing or provision of guarantees, when the necessary conditions are met, such as the Greek State, the Hellenic Development Bank, the European Investment Fund, etc.

i) Companies providing investment services, management of stocks and reserves, stock exchanges, receipt and transfer of orders or custody for the execution of orders related to the above activities and in general any entity involved in the information for the specific category of transactions and their processing or in completion of transactions or provision of the above services.

j) Property management companies or real estate investments.

k) Companies issuing digital certificates and / or digital signatures.

l) Companies of certified auditors.

m) Potential or existing buyers of all or part of the activities or assets (including rights) of the Bank, issuers of bond loans and representatives of bondholders.

n) Third parties who submit an application to the Bank for information, provided that the legal requirements are met.

5. Transfer of your Data to third countries or international organisations

The Bank may transfer Data to third countries or international organisations outside the European Economic Area (EEA), provided that:

a) The European Commission has adopted an act for their adequate protection in that country or in the international organisation concerned.

- b) Appropriate guarantees have been provided for their processing under the legislation.
- c) In the absence of the above conditions, a transfer may take place if the following derogations occur:
- i) You have been duly informed and have given your explicit consent.
 - ii) It is necessary for the execution of a contract with the Bank (e.g. remittance to a bank account of a third country credit institution) or for the application of pre-contractual measures, at your request or for the conclusion or execution of a contract concluded in your favor.
 - iii) It is necessary for the establishment, exercise or support of legal claims.
 - iv) It is necessary for important reasons of public interest.
 - v) There is a relevant obligation under a provision of law or an international agreement or transnational agreement, such as in the case of compliance with the regulatory and regulatory framework for the automatic exchange of information in the tax sector (e.g. CRS-Common Reporting Standard, FATCA-Foreign Account Tax Compliance Act).

It is noted that for the fulfillment of (ii) and (iii) of item c) above, the Bank may forward your Data to competent national authorities in order to be transmitted through them to the respective authorities of third countries.

6. Retention of your Data

The Bank shall keep your Data for as long as is deemed necessary on the basis of the purpose served each time by their processing in accordance with the above, otherwise for as long as is required under the applicable legal and / or regulatory framework.

In particular and indicatively:

- a) In case of concluding a contract with the Bank, the latter shall retain the Data throughout its duration. In any case of expiry or termination of the contract, the Data shall be kept until the completion of the statutory limitation period of the claims, namely up to twenty (20) years from the expiry or termination thereof and the repayment of any debt arising therefrom.
- b) In any case of non-completion of the conclusion of a contract or transaction with the Bank, in the context of submitting your relevant application, either in a physical branch of the Network or using the alternative electronic banking networks, the Data shall be kept for up to five (5) years from the rejection the relevant application or the termination of the pre-contractual stage in any way.

It is noted that in case of your participation as a party in an ongoing court proceeding with the Bank or any related to the same Company, the Data are kept until the issuance of an irrevocable court decision.

It is further noted that the contract documents in paper form bearing your signature and in which Data have been registered, may, after five (5) years and at the discretion of the Bank, be kept only in electronic / digital format.

7. Your data protection rights

As Data Subjects you have the following rights:

- a) To be informed of the categories of your Data, their origin, their processing purposes, the categories of their recipients and the period of their retention (Right of Access).

b) To request the correction and / or completion of your Data in order to be complete and accurate (Right to Rectification). In this case you need to provide us with any necessary document from which the need for rectification and / or completion is concluded. **Please note that this right is also your obligation.**

c) Request the erasure of your Data (Right to be Forgotten).

d) To request the restriction of the processing of your Data (Right to Restriction of Processing).

e) To object to the processing of your Data if it is based on the necessity of fulfilling a duty that is performed in the public interest or is necessary for the purposes of legal interests pursued by the Bank or a third party including profiling in these cases (Right to Object).

f) In case of exclusively automated decision-making, including profiling as above under Ch. 3 hereof, which produces legal effects against you or significantly affects you, the Bank gives you the right to human intervention, the right to express your opinion on this decision and the right to challenge this decision. **These rights may be exercised within an exclusive period of forty-five (45) days from the knowledge of the decision to ensure the security of transactions.**

g) To request the transfer of your Data to other persons and organisations, which you indicate to us (Right to Data Portability).

h) To withdraw your consent at any time in cases where it is necessary for the processing of your Data.

i) To lodge a complaint to the Hellenic Data Protection Authority (DPA), if you consider that your above rights are being infringed in any way. For the Authority's competence and how to lodge a complaint, you can visit its website (www.dpa.gr).

Indicatively, the following are noted in relation to your above rights:

The Bank may not satisfy, in part or in full, your above rights under items (c), (d), (e), provided that the Data are necessary for the preparation and / or continuation of the operation of the relevant contract, regardless of the source of their collection.

The Bank has the right in any case to refuse the satisfaction of the request for restriction of the processing or erasure of your Data, if the processing or retention of these Data is necessary for the establishment, exercise, support of its legal rights and interests and its compliance with its obligations under the law as above.

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

The exercise of the above rights acts for the future and does not relate to Data processing already performed.

8. Protection of Your data

For 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, as Controller, shall apply appropriate organisational and technical measures, including, but not limited to, information security management system while keeping its systems, policies and procedures up to date.

9. How to exercise your rights

For the exercise of your above rights and for any issue related to your Data, you can address in writing the Data Protection Officer of the Bank, by sending a postal letter to the address of the seat of the Bank: 32 Aigialeias & Paradissou Street, Maroussi, Attica, PC 15125, attention of the Data Protection Officer (DPO), or by sending an e-mail to: dataprotection@optimabank.gr .

The Bank will make every 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 will inform you in any case of extension of the deadline within thirty (30) days of receipt of the request. The exercise of your above rights does not entail any burden on you. However, in cases where the requests are manifestly unfounded, excessive or repeated, the Bank may either impose a reasonable fee on you, informing you thereof or refusing to respond to them.

10. Amendments hereto

This replaces all your previous information regarding the processing of your Data, which has been performed by the Bank, as Controller.

The Bank may update, supplement and / or modify this Information in the future, which under its latest version will always be posted on its website (<https://www.optimabank.gr>) and available in hard copy in its Branch Network.