

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

The **Optima bank S.A.** (hereinafter referred to as "the Bank"), faithful to the commitments made towards its customers, fully respecting and feeling responsible for the security of your personal data, protects your privacy and handles your personal data in line with the assurances of legality and transparency. The personal data we collect and process are dependent on the product or service requested and agreed with you in each individual case.

This personal data protection statement is addressed:

- To natural persons who are current or potential clients of the Bank
- To natural persons who had such a contractual relationship or were potential clients of the Bank in the past

and provides:

- Overview of the purposes for which the Bank collects and processes your personal data and the manner in which it does so and it notifies you of your rights under the National Data Protection Law and the General Data Protection Regulation (2016 / 679) of the EU (GDPR)
- Information as to who, other than the Bank, and for what purposes can receive your collected personal data
- Information on your rights regarding access, correction, deletion, objection and portability of your data.

For facilitating the reading of the present statement, we inform you that "personal data" is also referred to as "personal information". In addition, by "processing" we refer to the collection, recording, use, adaptation or alteration, protection, disclosure by transmission, dissemination or otherwise making available, storage and erasure/ destruction of your personal data or to any other action related to them.

For the purpose of this informative statement, personal data shall mean any information relating to you that identifies you or by which you can be identified, including but not limited to your name, address, email address and online identifiers such as your Internet Protocol Address (IP Address) or your ID number.

### 1. Categories and origin of personal data we process

#### 1.1 Categories of Personal Data

As a Bank, we collect and process different types of personal data:

- Identification data, i.e. name, father's name, Identity Card Number, Tax Identification Number, date and place of birth, sex etc.
- Contact information, i.e. postal and e-mail address, fixed and mobile telephone number etc.
- Data concerning your economic and financial situation, such as your profession, income, dependent family members information, financial assets and property tax declarations (i.e. E1, E9) etc.
- Data concerning your creditworthiness and economic behavior, such as loans and advances provided by financial institutions, your credit scoring/credit profiling
- Data concerning failure to meet your financial obligations (such as termination of loan and credit agreements, blocking of accounts, bounced cheques, orders for payment, seizures, applications for/or decisions on reorganization or bankruptcy etc.)
- Data related to managing your contracts with our Bank and the use of our banking products and services provided to you (i.e. debit and credit cards)
- Data obtained from payment transactions and the provision of payment services

- Data related to your electronic identification and connection with electronic banking services (web-banking), provided through alternative channels
- Data regarding your knowledge and experience in the investment sector, your investment goals, risk tolerance etc.
- Data from your answers on Bank's customers satisfaction surveys
- Data related to your identifiers, which are provided by telephone recordings or applications you are using, like IP Address or other data made available via electronic devices, as location data or Cookies)
- Biometric data deriving from the use of e-Signature (when you sign papers using a special pen on a digital tablet) only on condition that you have chosen this form of signing and you have explicitly consent
- Visual and voice data collected from the closed-circuit television (CCTV) and telephone conversation recordings.
- Health data concerning you and dependent members of your family, collected in accordance with the law.

## 1.2 Origin of the Data

The aforementioned data may be collected or produced by our Bank (e.g. cases referred to credit-rating, AML customer profiling) or from the following sources:

- You, as (current or potential) customers and your authorized representatives
- Publicly accessible sources (Courts, Independent Authorities, Land Registries, etc.)
- Our Affiliated Partners/ Tied Agents
- Alternative communication channels (e.g. e-mail, website)
- Electronic banking services via alternative channels (web-banking)
- The company TIRESIAS SA (within the framework of the protection of bank credit and the resolution of banking transactions, the Bank collects a significant amount of personal data from Tiresias SA).

## 2. The reason why we collect and process your personal data

As mentioned above, we are committed to protecting your privacy and handling your data in a legal and transparent manner. Therefore, we collect and process personal data for the following reasons:

### 2.1 Serving you as Clients of the Bank

We process personal data with a view to conduct banking transactions and provide financial services pursuant to our signed contracts with you. This process serves, indicatively, the following purposes:

- To verify your identification and communicate with you during both the pre-contractual and the client acceptance completion stage, as well as during the your contractual relationship with the Bank
- To conclude and perform a contract with you and to fulfil the Bank's obligations towards you.
- To conduct banking transactions and provide payment services
- To grant loans
- Debit/ Credit Card issuing
- To provide investment services in compliance with the legislative and regulatory framework
- To inform you about the Bank's products and/ or services already provided to you
- To conduct researches
- To promote new products and services of the Bank or of any other group of companies or third party companies cooperating with the Bank

## Legal grounds

Data processing for the purpose of serving you is based on the following legal grounds:

- The performance of a contract which you have concluded with us
- Fulfilling our legal obligations. Data collection and further processing, that help us deliver our services to you, as Clients, is considered to be compliant with the legal and regulatory framework, governing the operation of banks.
- Protection of our legitimate interests, which consist of business reasons that make data process necessary. Prior to this processing, the Bank ensures that the Bank's interests do not override your fundamental rights and interests.
- Your consent, especially when the processing serves the purpose of the development and promotion of new products and services of the Bank or other Group of companies or third party cooperating companies, preceding the profiling process.

### 2.2 Managing Bank's Operations and Management

We process your personal data, because it is necessary for the Bank's efficient operation and in accordance with the regulatory framework governing the operation of financial institutions. This process serves, indicatively, the following purposes:

- Ensuring Bank's viability and defending its legal rights before judicial and other authorities in the context of any court or extrajudicial proceedings
- Compliance with certain obligations arising from the relevant legislative and regulatory framework (European and National) governing the operation of banks, such as, to name but a few, compliance with court rulings and Directives and Decisions of supervising authorities, the Tax Legislation, Deposit Insurance scheme etc.
- The identification and assessment of Clients and potential clients, in the context of our obligations for the prevention and suppression of money laundering and terrorist financing and fraud prevention
- The provision of payment services
- Protection and prevention of criminal activities through the installation of surveillance systems (closed circuit television cameras - CCTV)
- Further development or promotion of products and Bank's services
- Risk Management.

## Legal grounds

Data processing for the purpose of managing Bank's operations is based on the following legal grounds:

- the performance of a contract which you have concluded with us
- our legal obligations arising by the legal and regulatory framework governing the operation of banks
- our legitimate interests.

## 3. Who are the recipients of your personal data?

We may transmit your personal data for any of the above-mentioned reasons (see section 2) or in case you have given us your consent. Under the above circumstances, recipients of personal data may be:

- Supervisory, regulatory, independent and judicial authorities, insofar as there is legal obligation. Some examples are the Bank of Greece, the European Central Bank, the Hellenic Capital Market Commission, the tax authorities, the Ministry of Finance, the Prosecution Authorities, the authority provisioned in Article 47 of Law 4557/2018
- Financial Institutions, correspondent banks, payment services providers and entities that are necessarily involved in the execution of contracts with you or your transactions, such as SWIFT, SEPA, VISA, MASTERCARD etc.

- TIRESIAS SA in order to fulfill the need for access to secured economic behavior data, including the TIRESIAS Risk Checking System (TSEK)
- IT supplies, development and support companies
- Information society services providers (messaging platforms)
- Investment, stock and shares management firms
- Custody services providers
- Co-financing bodies or funding providers such as the European Investment Fund, the Hellenic Fund for Entrepreneurship and Development (ETEAN), European Investment Bank, the public sector etc.
- Companies issuing written statements
- Companies issuing digital certificate and digital signatures
- Non-performing loans management companies that have been established and operate lawfully in accordance with the provisions of law
- Debt collection agencies
- Cooperating law firms or lawyers, notaries and bailiffs for the conduct of any judicial or extra-judicial proceedings
- Financial and business consultants
- Auditors and accountants for the fulfilling of Bank's obligations
- Advertising agencies and companies conducting customers satisfaction surveys
- Companies that help us provide you with debit, credit, prepaid or other charge cards, such as Visa and Mastercard
- Fraud Prevention Agencies
- File storage companies, archiving, digitalizing and/or file management companies
- Companies that help us effectively deliver our services to you by offering expertise, solutions and support as well as payment facilities
- Purchasing and procurement companies as well as companies managing the creation and support of Internet sites
- Credit Rating agencies
- Third parties that submit a request for information to the Bank, given that all legal conditions have been met
- Potential or existing buyers, and/or recipients of the transfer and/or assignment, and/or beneficiaries of any charges, title or interest of the Bank under any agreement between the latter and the customer, professional consultants, service providers, suppliers and their sponsors.

#### 4. Transmission of personal data to a third country or to an International Organization

Your personal data may be transmitted to third countries (i.e. countries outside the European Economic Area) under the following circumstances:

- if the European Commission decides that the third country ensures adequate level of protection or
- if appropriate safeguards have been provided from the recipient, according to the law requirements.

In the absence of the abovementioned circumstances a data transfer may take place if:

- the transfer is necessary for the execution of a contract between you and the Bank, such as for the execution of orders (i.e. transmission of a payment order to a bank account of a third country), in which case the necessary data will be transferred to the necessarily involved operational bodies, (i.e. SWIFT,SEPA, correspondent banks etc.)
- the Bank is obliged by law to provide the data
- the Bank is obliged to comply with regulations regarding the automatic exchange of data within the tax sector
- the transfer is necessary for the purposes of the legitimate interests by the Bank and for the establishment, exercise or defense of legal claims
- You have explicitly consented to the transfer.

#### 5. To what extent is there an automated decision making process including profiling?

We may automatically process some of your data to evaluate some personal aspects (profiling) in order to conclude or perform a contract with you in the following cases:

- For data evaluation (including those for payment transactions), which are carried out in the context of combating money laundering and fraud.
- To evaluate your investment profile, according to regulatory framework for investment services (MiFIDII, L. 4518/2018). We evaluate your knowledge, experience, your financial and family status, in order to create your investment profile. Based on this profile, automated decisions are made on accepting and executing orders.
- To assess your creditworthiness. The processing of your data calculates if you can fulfill the repayment obligations you undertake under a contract. This helps us make responsible lending decisions, which are fair and informed.
- To commercially promote products and services of the Bank, the Group and third-party companies.

#### 6. How do we handle your personal data for product and service promotion activities (marketing) and to what extent is profiling used for such activities?

We may process your personal data to inform you of products, services and offers that may be of interest to you.

The personal data we process to this end consist of information you have already provided us with, or data we collect when you use our services, such as information about your transactions. We investigate all this information to shape an opinion on what we think you may need or what you may be interested in. In some cases, profiling is used, i.e. we process your data automatically for the purpose of evaluating certain personal information in order to provide you with targeted product information.

This data processing (profiling), made for the promotion of our banking products and services, is necessary for the purposes of the legitimate interests pursued by the Bank. However, when this processing overrides

your fundamental rights and interests, we may use your personal data to promote our products and services to you only if we have your explicit consent in this respect, which you may withdraw at any time.

## 7. How long do we keep your personal information?

We will keep your personal data at least as long as we have a contractual relationship with you. Once our contractual relationship is terminated, we keep your personal data for a period up to **twenty (20) years**.

In case there is no contract (potential clients), we will retain your personal data for **five (5) years**.

We do this, in order:

- to be able to respond to any queries or complaints by justifying that data processing has been lawful, appropriate and transparent
- to comply with our regulatory, tax and other obligations
- to be able to defend in case of a judicial dispute. If there is a pending judicial dispute, the Bank keeps the personal data for a longer period of time, until the matter is settled and the dispute is resolved.

Specifically, with respect to video data collected from video recording systems in customer service areas or entrances of the Bank, it is kept for a period not exceeding forty-five (45) days from video recording. As regards your recorded phone calls with Bank's representatives, the Bank keeps, compulsory, the data for one (1) year from any such phone call conversation, unless you or the General Secretariat for Consumer Affairs request data to be retained.

After the elapse of the above-mentioned time periods, and if there are no other lawful reasons for the retention of the data (e.g. controversy before a Court), the Bank must permanently and effectively destroy the records/documents where personal data is kept, with the appropriate, if applicable, measures (e.g. incineration, recycling, shredding of documents, anonymization etc.).

## 8. Your data protection rights

As data subjects, you have the following rights with respect to your personal data retained by the Bank:

- **Access** to your personal data. This allows you, for example, to receive a copy of the personal data retained by us and make sure that we are processing it in a lawful manner, as well as request to receive a copy of your personal data in a structured, commonly used and machine readable format for the transmission of this data to other organizations.
- **Ask for the correction** of your personal data. This enables you to amend any incomplete or inaccurate data we retain.
- **Ask for the erasure of your personal information** (known as the "right to be forgotten"). This allows you to request the erasure of your personal data when there is no valid reason to continue processing it.
- **Prohibit the processing of your personal data** (known as "the right to object") when we rely on a legitimate interest, but there is something special about your situation that makes you want to oppose processing on that ground. If you file an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate reasons for processing that override your interests and rights.

You also have the right to object in cases where we process your personal data for direct marketing purposes.

- **Ask for the restriction of the processing of your personal data.** This allows you to ask us to restrict the processing of your personal data, that is to it use it only in certain circumstances, if:
  - it is not accurate
  - it has been used illegally, but you do not wish us to erase them
  - it is no longer needed, but you want us to retain them for potential legal claims
  - you have already asked us to stop using your personal data, but you are waiting for us to confirm if we have legitimate reasons to use it
- **Ask to have your personal data transmitted** directly from us to other organizations of your choice (right to data portability).

To submit your written request, you may address it directly to our Data Protection Officer or mail it to [dataprotection@optimabank.gr](mailto:dataprotection@optimabank.gr).

The Bank is required to respond to any of your requests within thirty (30) days of its receipt. In exceptional circumstances, this deadline can be extended for an additional period of sixty (60) days by contacting you respectively.

Furthermore, **you can file a complaint** to the Hellenic Data Protection Authority if you believe that your personal data is not processed in accordance with the provisions of this statement.

#### 9. How do we protect your privacy?

In order to keep your data safe and protected against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access and any other form of unlawful processing, the Bank keeps its systems, policies and procedures updated.

#### 10. Who is responsible for processing your personal information?

Data Controller  
Optima bank S.A.  
32, Aigialeias & Paradissou Street  
151 25 Maroussi, Attica  
Web page: [optimabank.gr](http://optimabank.gr)

#### 11. With whom can you contact for any questions related to this statement and the exercise of your rights?

Optima bank S.A.  
C/o Data Protection Officer (DPO)  
32, Aigialeias & Paradissou Street  
151 25 Maroussi, Attica  
Tel .: +30 210 8173695  
Email Address: [dataprotection@optimabank.gr](mailto:dataprotection@optimabank.gr)

The above information supersedes any previous information regarding the processing of your personal data. The Bank may update, supplement or modify it without any prior notification.