

UPDATE ON THE PROCESSING OF PERSONAL DATA

The Société Anonyme under the name **“Piraeus Agency Solutions Single-Member Societe Anonyme for the Provision of Insurance Products’ Distribution Services and Financial Services”** having its registered offices in Athens (87. Syggrou Avenue) VAT Reg. No.: 997671273, Tax Office: Athens Companies Tax Office, GTR (GEMH) Reg. No.: 009621001000, as **Personal Data Controller**, hereinafter referred to as the “Company”, in the context of the General Data Protection Regulation (EU) 2016/679 which enters into force **on 25/05/2018**, hereinafter referred to as “GDPR”, as applicable, hereby provides you with the following information on the processing of your personal data and your rights as a data subject. The new Regulation replaces the existing legal framework and completely repeals Law 2472/1997 on the protection of individuals with regard to the processing of personal data. **As of the above date any reference to the provisions of Law 2472/1997 shall be understood as a reference to the provisions of the new "GDPR".**

This information is addressed to natural persons who engage in transactions with the Company, when the latter acts as a personal data controller, including (without being limited to) Customers who maintain a working relationship with the Company, their legal representatives as applicable as well as their special or universal successors, representatives of legal persons and any natural person carrying out transactions with the Company in any capacity.

Personal data processing comprises the collection, registration, organisation, structuring, storage, change, retrieval, information search, use, transmission, restriction or deletion of personal data which have or will come to the Company’s knowledge, either in the context of your transactions with the Company or in the context of information received by the Company from a third natural or legal person or public body in the exercise of a legal right of the latter or of the Company itself.

In complying with the applicable legal framework, the Company has taken all necessary steps, implementing the appropriate technical and organizational measures for the lawful maintenance, processing and safe storage of the personal data file by committing itself to ensure and protect the processing of your personal data against loss or leakage, alteration, transmission or any other unlawful processing in any manner whatsoever.

A. What personal data we process and where we collect such data from

- The Company processes your personal data which you or your legal representatives have submitted or are about to submit to the Company and as necessary for the initiation, retaining and performance of your current or future transactions with the Company, depending on the service or product provided and the Company’s applicable procedures

and policies. Your personal data that you provide to the Company must be complete and accurate and must be promptly updated by you, in any case of modification thereof or whenever otherwise deemed necessary by the Company in order for the latter to ensure continuation of your transactions or compliance with any of its obligations under the law and applicable regulations. The Company also processes your personal data which are received by it or coming to its knowledge from a third natural or legal person or public body and are necessary either for the achievement of the legitimate interests of the Company itself or a third person, or for the performance of the Company's duties carried out in the public interest (e.g. tax and insurance bodies).

- In order to initiate and retain its trading relationship with its Customers, the Company collects and processes the following minimum personal data: Name, maiden name, identification/ passport or other official identification document, permanent place of residence, home address, correspondence address, professional details and income tax return note), tax residence, tax registration number, telephone (landline and/or mobile), as well as a signature sample (physical or electronic). Additional information may be required as appropriate (e.g. student ID card, driver's license), in case such information is a precondition for entering into or retaining a specific transaction relationship. Depending on the service or product offered by the Company, the Company may further collect and process the following data including, without being limited to: financial information (e.g. tax returns, income tax returns, ENFIA returns, financial information of a private undertaking) or other sources of income, valuation of assets, details of an asset being financed or offered as collateral, insurance policies (e.g. to cover fire/earthquake risks) and information specified by the insurance company as necessary for the conclusion of your insurance policy under the respective legislative or regulatory framework governing their operation.

The collection and processing of your said personal data by the Company is necessary for the initiation, execution and retaining of trading relations between us. Any objection you may have to the provision or processing of your personal data may result in your inability to initiate or continue your cooperation with the Company.

B. Processing of specific personal data categories

The Company does not process your personal data, including data relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic or biometric data with a view to identifying you as a subject of the processing as well as health data or data relating to your sexual life or sexual orientation, unless: a) you have expressly consented to this for a specific purpose; b) such data have been disclosed to the Company by you or a third natural or legal person in the context of documenting and safeguarding your legitimate interests and/or the interests of the Company as a controller; c) the processing is necessary for the protection of your vital interests or those of another natural person; d) the processing is necessary to establish, exercise or support both your

own legal claims and those of the Company; e) the processing is necessary for reasons of an essential public interest (investigation of a criminal offence under the law to prevent and suppress money laundering, terrorist financing and insurance fraud). The Company has in any case taken all necessary technical and organizational measures for the safe retention and processing of your personal data belonging to the above specific categories.

C. Data relating to children

The processing of personal data of minors shall be carried out subject to the prior consent of their parents or guardians, unless otherwise specified by the law. For the purposes of this notice, persons who have not yet completed their 18th year of age are considered minors.

D. Lawfulness of the processing

The Company lawfully processes personal data, provided such processing:

- Is necessary to serve, support and monitor your transactions with the Company and the proper performance of the agreements between you and the Company.
- Is necessary for the Company's compliance with its legal obligation or for the pursuit of its legitimate interests arising from your transactions with the Company or from any other rights of the Company arising from the law.
- Is necessary for the fulfilment of its duty carried out in the public interest within the applicable legislative and regulatory framework.
- Is based on your prior explicit consent, provided such processing is not based on any of the aforesaid legal processing bases.

E. Revocation of consent

By making a statement to the Company, you have the right to withdraw your consent at any time, where required, without such revocation affecting the lawfulness of the processing that was based on it until it was revoked. The revocation of your consent may be submitted to the Company in accordance with paragraph K "How to exercise your rights and file a complaint" herein. Following your revocation, it may be impossible for the Company to continue providing insurance mediation services. (e.g. when you revoke your consent to the processing of your specific personal data but have requested health insurance).

F. Purposes of processing

The processing of your personal data concerns:

- The service, support and monitoring of your transactions with the Company and/or the insurance company, the proper performance of the agreements between you and the Company, the examination of requests for the provision of services by the Company, the fulfilment of the Company's obligations as data controller and processor and the exercise of its legal and contractual rights.

- The execution of controls provided for by the applicable legislative and regulatory framework.
- The registration, recording and archiving of all your instructions to the Company that are made either in writing, electronically, or by telephone, for the preparation of transactions and for reasons of transaction protection.
- The upgrading of the products and services provided by the Company and the promotion of the Company's products and services, the Piraeus Group companies and the companies having business relations with the Company, subject to your prior consent.
- The satisfaction of all requests addressed to the Company or the examination of your complaints regarding the Company's products and services.
- The fulfilment of the Company's legal obligations originating from the applicable legislative and regulatory framework (e.g. legislation to prevent and suppress money laundering, the fight against terrorism and insurance fraud, tax and insurance provisions).
- The defence of the Company's legitimate interests which, for example, may relate to the following: a) asserting its legitimate claims before the competent judicial authorities or other out-of-court/alternative dispute resolution bodies; b) preventing fraud and other criminally prosecuted acts; c) evaluating and optimizing security procedures and information systems; d) managing operational risks of the Company; e) physical security and protection of persons and property (e.g. video surveillance).

G. Automated decision-making and profiling

The Company does not make decisions based exclusively on automated personal data processing procedures. However, it may legitimately make such decisions, including profiling, for the purposes of monitoring and preventing fraud against the Company or any third party, as well as for the assurance and reliability of the services or products provided by the Company, or where such processing is necessary for the conclusion or performance of an agreement based on personal data obtained directly from you or a third natural or legal person.

H. Personal data processing & profiling for direct marketing purposes

Subject to your prior consent, the Company may process your personal data in order to inform you of its services and products that may be of interest to you. To this end, it processes information about its services that you use and/or the usual transactions you carry out in order to present you with services, products, or offers that best serve your needs.

In any case, you have the right to object to the processing of your personal data for the aforesaid purpose of direct marketing for f the Company's products / services, including

profiling, by addressing your request to the Company in accordance with paragraph K “How to exercise your rights and file a complaint” herein.

I. Data retention time

The Company shall retain your personal data for as long as provided for in each case by the applicable legislative and regulatory framework and in any event for a period of twenty (20) years from the last calendar day of the year of termination of your respective transaction relationship with the Company. In the event that any request for your cooperation with the Company is not accepted and the preparation of the agreement is not completed, the data will be retained for a period of five (5) years. In the event of litigation, the personal data relating to you shall in any case be retained until the pendency of the action is terminated, even if the above period of twenty (20) years is exceeded.

J. Who are the recipients of personal data

Access to your personal data is granted to the Company’s employees, within the scope of their responsibilities, the Group companies in the context of the proper execution and fulfilment of their contractual, legal and regulatory obligations, as well as to the auditors of the Company and/or the Group as appointed from time to time.

The Company shall not transfer or disclose your personal data to third parties, unless such third parties include:

- Undertakings (domestic and foreign) with which confidentiality commitments have been undertaken and to which the Company has assigned, in whole or in part, the execution on its behalf of the processing of your personal data, or undertakings (controllers) for which the Company has undertaken to carry out the processing of your personal data on their behalf, or (a) within the framework of a contractual relationship between them specifying the subject matter, purpose, duration of processing, type of personal data to be processed and the rights of the contracting parties, or (b) within the framework of their regulatory obligation to maintain confidentiality, including, without being limited to the following:
 - i. Insurers and Reinsurers as well as Mediation Companies (domestic and foreign).
 - ii. Credit Institutions and their subsidiaries.
 - iii. Digitisation and companies managing physical archives (storage, destruction).
 - iv. Companies issuing and delivering letters.
 - v. Partnering companies for the participation or promotion of the Company’s services and products through such companies.

The Company has lawfully ensured that its appointed processors meet the requirements and provide sufficient assurances as regards the implementation of appropriate technical and organizational measures, so that the processing of your personal data ensures protection of your rights.

- Undertakings/companies associated with the Company within the meaning of Article 32 and Annex A of Law 4308/2014.

- Transmission or disclosure, as required by the applicable regulatory, legislative and general regulatory framework or a court judgement (e.g. transmission to judicial authorities, tax authorities, supervisory bodies, intermediaries).
- Judicial authorities, public bodies and responsible supervisory authorities within the framework of their legal competences.
- The Bank of Greece or other supervisory or audit bodies within the framework of their legal competences.

K. Rights of the data subject

Where the Company acts as a controller, you retain the following rights as a personal data subject:

- Right to access** personal data concerning you and provided such data are processed by the Company as controller and access to its purposes, categories of data and recipients or categories of recipients thereof (GDPR, Article 15).
- Right to rectification** of inaccurate data and to have incomplete data completed (GDPR, Article 16).
- Right to erasure** of your personal data without prejudice to the Company's obligations and legal rights to retain such data in accordance with the applicable laws and regulations (GDPR, Article 17).
- Right to restriction** of processing of your personal data, in case either the accuracy of such data is contested, the processing is unlawful or the purpose of processing is eliminated and provided there is no legitimate reason for the retention of such data (GDPR, Article 18).
- Right to portability** of your personal data to another controller, provided the processing is based on your consent and is carried out by automated means. The satisfaction of the said right is without prejudice to the Company's legal rights and obligations to retain the data and perform its duties in the public interest (GDPR, Article 20).
- Right to object** on grounds relating to your particular situation where your personal data are processed for the execution of a duty performed in the public interest or in the exercise of public authority conferred on the Company or for the purposes of the legitimate interests pursued by the Company or a third party.

K. How to exercise your rights and file a complaint

Any request regarding your personal data and the exercise of your rights must be addressed in writing to: **“Piraeus Agency Solutions Single-Member S.A. , Office of the Data Protection Officer (DPO)”** and sent either to piraeusagency@piraeusbank.gr or by post to 87. Syggrou Avenue, Athens, 117 45, or delivered to any Piraeus Bank S.A. branch. The full details of the DPO can be found on the Company's website (www.piraeusagencysolutions.gr), under Customer Information > General Data Protection Regulation (GDPR). A special form for exercising the right of access is available at the Bank's branches.

In any case of refusal or undue delay by the Company to fulfil your requests when you exercise your rights, you shall be entitled to appeal to the **Data Protection Authority**, being the competent supervisory authority for the application of GDPR.

In any event, you reserve the right to file a complaint with the competent supervisory authority, should you consider that your personal data are being processed in breach of any applicable law. For more information, visit www.dpa.gr.

Please be advised that the Company uses cookies on its website to improve your online experience. For details on cookies, please refer to the Terms of Use on the Company's website at (www.piraeusagencyolutions.gr).

Based on its applicable data protection policy and in the context of the applicable legislative and regulatory framework, the Company may revise or amend this notice, which will always be available on its website at (www.piraeusagencyolutions.gr), under Customer Information > General Data Protection Regulation (GDPR).