

GENERAL DATA PROTECTION POLICY

ON THE PROCESSING OF PERSONAL DATA OF TIRESIAS'S S.A. FILES

in accordance with Article 14 of Regulation (EU) 2016/679 (General Data Protection Regulation)

The present policy sets the applied principles by TIRESIAS S.A. during the processing of these data (categories, legal basis, protection measures, rights, etc.) and aims to inform the subjects about the processing of personal data.

It is available on our Company's website (<http://www.tiresias.gr>) and may be amended/updated periodically.

WHAT IS PERSONAL DATA

Any information related to an identified or identifiable natural person («Data Subject»).

PROCESSING

Any operation or set of operations which is performed, with or without the use of automated means, on personal data or on sets of personal data, whether or not by automated means, from their collection, storage, erasure, destruction or anonymisation.

DATA CONTROLLER

The Company under the name BANKING INFORMATION SYSTEMS S.A. and the distinctive title TIRESIAS S.A. ("TIRESIAS") (controller), with its registered office at 2 Alamanas Str., Maroussi 151 25 (tel. 210-36.76.700), keeps the following records:

RECORDS HELD BY TIRESIAS

A. REFERENCE FILE

1. **Purpose of Processing:** To ensure that data of TIRESIAS files are correctly recorded, kept up to date, correctly associated with the natural (and legal) entity to whom they relate and that it is possible to identify accurately the natural (and legal) entities in the files (hereinafter referred to as "Economic Operators").

2. **Legal Basis:** Compliance with a legal obligation, i.e. the maintenance of a complete, up-to-date and accurate data file.

3. **Data Categories:** Data related to the identification of natural (and legal) persons, namely their VAT Identification Number (VAT) and Identity Card (ID card) or passport, (their surname or) full name and patronymic, addresses (street, number, district, postal code) (GEMI number and ID number).

4. **Data sources:** The data in the reference file were originally taken from the file of the VAT number for the 1992 financial year of KEPYO (GENERAL DIRECTORATE OF THE INFORMATION CENTER OF THE MINISTRY OF FINANCE), granted to TIRESIAS by the Ministry of Finance. Since

then, the reference file has been continuously enriched with additional or newer data (VAT numbers, ID numbers, addresses, etc.) from the taxpayers' register of the Independent Public Revenue Authority, on the basis of Art. 17 par. 1 o) of L.4174/2013 (Code of Tax Procedure), as added by Art. 52 par. 1 of L.4569/2018 (once the interconnection is completed), from the paper or electronic documents of the primary data entered in the respective Economic Units, as well as from the requests submitted to TIRESIAS by the data subjects.

5. Retention period: In view of the above-mentioned processing purpose of the reference file, the data in it are kept without time limitation.

6. Data recipients: In view of the above purpose, the reference file is an internal file of the company and will not be transmitted independently to third parties, except in the context of obtaining data from the following files kept by TIRESIA for a specific natural (or legal) person.

7. Automated decision making: no automated decision process or profiling takes place within the reporting file.

B. ECONOMIC BEHAVIOR DATA FILES

B.I. DEFAULT FINANCIAL OBLIGATION SYSTEM (DFO) & MORTGAGES AND PRENOTATIONS TO MORTGAGES SYSTEM (MPS) (DECISIONS no. 109/99, N. 3816/2010 and 24/04 of the HDPA) ¹

1. Purpose of the Processing: I. Default Financial Obligation System (DFO): the protection of commercial credit and the resolution of financial transactions, through the provision to the recipients of the data of the opportunity to evaluate the solvency of their counterparties.

II. Mortgages and Prenotations to Mortgages System. The protection of commercial credit and the consolidation of transactions by informing recipients of charges over their debtors' immovable property, and thus enabling them to obtain security against the credit risk they undertake.

2. Processing Legal basis: Legitimate interest pursued by the recipient of the data (in particular, the establishment and execution of a contract by the recipient under which credit risks are assumed), compliance with legal obligations, etc.

3. Data Categories: Data regarding the default of specific financial obligations, which are characterized by a high degree of objectivity and concern:

3.1. Default Financial Obligation System (DFO) a. Bad (sealed) checks.

b. Unpaid, by their expiration, bills of exchange and promissory notes in order.

c. Applications for Bankruptcy.

d. Decisions rejecting applications for bankruptcy due to non-adequacy of the debtor's assets (Article 6 § 2 of L. 3588/2007).

e. Declared bankruptcies (L. 3588/2007, L. 4378/2020)

f. Payment orders (including arrears of reimbursement regarding rents).

¹ Hellenic Data Protection Authority

- g. Real Estate auctions
- h. Movable property auctions
- i. Mortgage and Prenotations to Mortgages System
- j. Seizures and cheques under L.D. 17.7/18.8.1923 special provisions for S.A. Companies.
- ja. Complaints of card contracts due to either unconventional use, or not to service it through the credit granted.
- jb. Complaints of consumer, residential and business credit due to late payment
- jc. Administrative penalties, imposed by the Ministry of Finance, against offenders of tax laws in order to safeguard State interests.
- jd. Applications and Decisions on Resolution (Articles 99 et seq. of Bankruptcy Code).
- je. Applications regarding judicial settlement of debts (Article 4 of L.3869/2010).
- jf. Decisions on the judicial settlement of debts (Article 8 of L.3869/2010)
- jg. Orders of Restitution of the Premise

3.2. Mortgages and Prenotations to Mortgages System

- a. Mortgages
- b. Prenotations to Mortgages

4. Data Sources:

The above data are collected from the following sources:

- a. Data under 1 a, b, ja, jb, je, and jf data: from Credit and Financial Institutions (as the case may be credit Supply Companies, Leasing Companies, Business Receivables Agency Companies, Card Issuing and Management Companies, Loan and Credit Servicing Companies, Payment² Institutions and Electronic Money Institutions³⁴)
- b. Data under 1 f, g, h, je, jf, and jf: from the District Courts
- c. Data under 1 f, g, h, je, jf και jg : from the Auction Publication Website of the EFKA-TAN.
- d. Data under 1 g, d, e, f, jd and jg : from Courts of First Instance..
- e. Data under 1 f: from the Administrative Courts of Appeal.
- f. Data under 1 i, j and 2 a and b: from Land Registry and Land Registry Offices.
- g. Data under 1 jc: from the Ministry of Finance through the Bank of Greece.

5. Retention Period:

5.1. Specific rules for each data category

- a. Bad Cheques, unpaid at their expiration, bills of exchange, promissory notes in order and Complaints of card and loan contracts are kept for two (2) years.

² As long as they provide faith

³ As long as they provide faith

⁴ An impact assessment report is prepared on the inclusion of microcredit sources and providers

The above data are deleted from the file if the debt has been paid in its entirety (i.e. all the data that exist recorded in the default file – with the exception of the Orders of Restitution of the Premises – have been paid and the prescribed period of time for all the data of the specific category has been elapsed.

b. Payment Orders are maintained for three (3) years.

c. Auctions, seizures and cheques for payment of the L.D. 17.7/13.8.1923 are maintained for four (4) years.

d. Administrative penalties of Ministry of Finance are maintained for four (4) years.

The above data of paragraphs b, c, d will be deleted from the File if the debt has been paid in its entirety (i.e. all the data that exist recorded in the default file – with the exception of the Orders of Restitution of the Premises – see case ia below) and the period prescribed has been elapsed for all the data recorded in the data file.

In Particular, data relating to complaints of loans and credit cards bearing the refinancing or final settlement indication shall be deleted in accordance with the above provided that the instruments (cheques, new loans, etc.) used for refinancing/settlement have been repaid.

e. Applications for bankruptcy shall be deleted, either by registration of the declaration of bankruptcy, or, if the relevant discussion is cancelled, after 12 months from the date of the (cancelled) conversation, in each case they shall be deleted in the month in which five (5) years are completed from the date which they were tabled in competent Court. In the event of rejection of the bankruptcy application, due to lack of the competence of the debtor's assets, the relevant information, shall be kept in the File for ten (10) years.

f. Applications for conciliation/resolution – including applications for (direct) ratification of resolution agreement and entering into a specific clearing in service – are deleted from the File after five (5) years from the date on which they were submitted to the competent Court, unless a decision to ratify the Conciliation/Resolution Agreement is adopted, so that information on the application and ratification of the Agreement is maintained in the file for a period of five years after the expiration of the Agreement. In case of the issuance of a decision rejecting the ratification of the conciliation /resolution agreement, the information on the application and the relevant judicial decision shall be kept in the file for five (5) years from the date of publication of that decision. In the event of a decision declaring the termination of the procedure for failure to reach an agreement (e.g. an unpracticability of the time-limit for reaching an agreement, renunciation of the conciliator), the information on the application and the relevant decision shall be kept in the file for five (5) years from the date on which the application was lodged with the competent Court. Finally, in the event of a decision to join a separate winding-up or termination of a settlement/resolution agreement, a filling of a pre-condition contained in the dissolution/resolution agreement, and where the duration of the reconciliation/resolution agreement is not available, then the information on the corresponding application and decision will be kept in the File for ten (10) years from the date of filing of the request to the competent body.

g. Information on declared bankruptcies shall be deleted after ten (10) years provided that the process does not continue, and in any case after fifteen (15) years after they have been declared. Similarly, the information on applications and decisions to validate a reconciliation/resolution shall be deleted after fifteen (15) years.

h. Information on Mortgages, prenotations to Mortgages and relapses in Mortgages shall be deleted from the File when they are removed from the corresponding Public Books.

i. Applications for judicial settlement of debts I. Requests for judicial settlement of debts, if, in those circumstances, a compromise pursuant to Articles 5 and 7 of L.3869/2010 as applicable, shall be kept in the register for a period of three (3) years after the repayment of the debts concerned. If the above applications fail to reach a compromise, they shall be deleted from the File three (3) years after the date of their discussion. In the event of the applicant's resignation, the request for information shall be deleted from the file one (1) year after the request has been lodged.

Debt settlement decisions shall be kept in the File for a period of three (3) years from the occurrence of the debt discharge in accordance with the first subparagraph of Article 11 (1) of L.3869/2010. For three (3) years the decisions on the full discharge of the debtor are maintained (Article 8 (2)). 5. 3869/2010) and the decisions by which the debtors are declared insolvent

ia. The Orders of Restitution of the Premises are maintained in the File for three (3) years from their publication, after which they are deleted in any case.

5.2 General rules on DFO data retention period:

- In any case, the data in categories from a to d and will be deleted after ten (10) years. Administrative sanctions which have not been lifted shall be excluded, shall be deleted after revocation.

- Information concerning sealed cheques, unpaid bills of exchange, promissory notes, complaints of card and loan agreements, payment orders, auction programs, seizures, cheque L.D.1923, bankruptcies in mortgages, bankruptcies and performance orders for the use of immovable property where they do not exceed a total of a thousand Euro (EUR 1 000,00), shall not be transmitted. This provision does not apply where there is a registered information on an application for bankruptcy without an amount, the bankruptcy or administrative penalty of the Ministry of Finance or the Application/decision of the conciliation/resolution authority, or an application for a court settlement of debts or a decision to settle debts or to an auction bearing the indication of a continuation without an amount. Non-transmitted data shall be restated if new data are recorded, exceeding the amount of €1,000,00.

- The above information that has been proven to be repaid if they do not exceed €3,000 in their entirety and does not exceed three (3) data do not appear in the file of transmitted information, but reappear if new data, which cause exceedance of either of the above limits, are recorded or not paid.

6. Data Recipients: Data of Files are available for own use on the following recipients⁵:

a. Bank of Greece.

⁵ An impact assessment report is also being prepared for inclusion in the list of legitimate beneficiaries and microcredit providers

b. Credit institutions.

c. Financial Institutions: Business asset factoring companies, leasing companies, issuing and management companies, credit providers, loan and credit claims management companies, payment institutions⁶ and electronic money institutions⁷.

d. Public sector bodies to the extent that processing is necessary for the fulfilment of a task carried out in the public interest or in the exercise of public authority vested in them.

7. Automated decision-making: In the context of the DFO and MPS File, neither automated decision-making is made, nor profiling takes place.

B.II TIRESIAS RISK CHECKING SYSTEM (TSEK) (DECISION NO. 186/2014 OF THE HDP)

1. Purpose of processing: To ensure the commercial faith, reliability, security of transactions and the exercise of the rights of economic freedom and the free information of undertakings by enabling traders to assess the creditworthiness of their counterparts.

2. Legal basis: The legitimate interest pursued by the recipient of the data (in particular the limitation of the credit risk borne), transaction security, economic freedom and freedom of information.

3. Data Categories: The following data in the default file (DFO) and Mortgages and Prenotations to Mortgages (MPS):

- Bad checks.
- Unpaid, at their expiration, bills of exchange and promissory notes at maturity.
- Applications for bankruptcies - Decisions rejecting bankruptcy applications due to adequacy of the debtor's property.
- Conciliation/resolution applications and decisions (Article 99 et seq. Bankruptcy Code).
- Declared Bankruptcies.
- Payable orders & Orders of Restitution of the Premises.
- Auctions of real estate.
- Auctions of movable property.
- Mortgages and Prenotations to Mortgages.
- Relapse of Prenotations to Mortgages.
- Property seizures and cheque books based on L.D. 17.7/13.8.1923.
- Applications and decisions on the judicial settlement of debts of L. 3869/2010.

⁶ As long as they provide faith

⁷ As long as they provide faith

In addition, company data are provided by the FEK (Government Gazette) and the GEMI (Business Portal) (see below under F).

4. Data Sources: The above under B - I, 4 (per case), the FEK and the GEMI

5. Retention Period: The listed above under B - I, 5 (for DFO & MPS data) and below under F for data from FEK (Government Gazette) and the GEMI (Business Portal).

6. Data Recipients: The data TSEK shall be provided for own use to natural or legal entities or associations of persons of the Civil Code engaged in a commercial, industrial, craft, agricultural or other undertaking in the Hellenic Territory or in another country of the European Economic Area or in another country of the European Economic Area and Switzerland, in which they are dealing with credit and therefore undertake to check the creditworthiness of their counterparties, after being informed.

7. Automated decision-making: In the context of the check file, neither automated decision-making is made, nor profiling takes place.

B. III. CREDIT CONSOLIDATION SYSTEM (CCS) (DECISION no. 86/02 OF THE HDP)

1. Purpose of processing: The assessment by data recipients of the creditworthiness of their counterparties.

2. Legal basis: The legitimate interest pursued by the recipient of the data (in particular the drafting and performing of contracts under which credit risks are assumed), compliance with legal obligations and the avoidance of over-indebtedness of borrowers.

3. Data Categories: Data are related to information on credit risks incurred by natural and legal persons (individuals, enterprises of all legal forms and sizes, etc.) from all types of financing by credit and financial institutions, including those arising from the settlement of overdue debts owed to them. In particular, data on current debts and in arrears from:

- a. Loans of all forms
- b. All types of credit
- c. Cards
- d. Letters of guarantee (letters of participation, performance, receipt of advance payment, timely payment, etc.); and
- e. Standing credits.

4. Data sources⁸: Credit institutions, credit, leasing and commercial agency companies, card issuing and management companies, loan and credit management companies, payment institutions⁹, electronic money institutions¹⁰ and the Fund of Public Works Contractors

⁸ An impact assessment report is also being prepared for inclusion in the list of legitimate beneficiaries and microcredit providers

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¹⁰ As long as they provide faith

(hereinafter referred to as 'the Institutions'), which are solely responsible for the accuracy of the data.

5. **Retention periods:** The above data shall be kept in the file for five (5) years from the last monthly update by the Institutions. If the outstanding balance has been paid, the information will be deleted from the name of the guarantor. In particular, data related to letters of guarantee and letters of credit shall be kept on file for five (5) years from the forfeiture/non-payment of the letter of guarantee or letter of credit respectively. In the event of late payment, they shall be automatically deleted.

6. **Data recipients:** The data in the file are made available for private use to the following recipients¹¹:

α. Bank of Greece.

β. Credit institutions.

c. Financial institutions: business debt agency companies, leasing companies, card issuing and management companies, credit granting companies, payment institutions¹², electronic money institutions¹³ and loan and credit management companies.

d. Public sector bodies to the extent that the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority delegated to them.

7. **Automated decision making:** no automated decision making, or profiling takes place in the context of CCS file.

C. ARCHIVE OF LOST - STOLEN IDENTIFICATION DOCUMENTS AND RECORDS (DECISIONS no. 523/99, 25/04 and 11/2006 of the HDP)

1. **Purpose of processing:** To reduce fraud and protect the citizen from the risk of concluding banking contracts with details of his/her lost/stolen identity or passport.

2. **Legal basis:** To conclude contracts with identified counterparties and to ensure that credit and financial institutions comply with the relevant legal obligation (know your customer), but also to safeguard the vital interest of the data subject.

3. **Data Categories:** Citizens' declarations concerning the theft, loss or replacement of their Police ID cards and passports and the numbers of lost/stolen/inactive ID cards, as well as the numbers of lost/stolen passports.

4. **Data sources:** the data subjects (holders of police identity cards and passports) and the corresponding file of the Ministry of Citizen Protection.

5. **Retention periods:** In view of the purpose of the processing served by this file, the data in this file are kept without time limitation.

¹¹ An impact assessment report is also being prepared for inclusion in the list of legitimate beneficiaries and microcredit providers

¹² As long as they provide faith

¹³ As long as they provide faith

6. **Data recipients:** The data in the file shall be made available for private use to the following recipients¹⁴:

α. Bank of Greece.

β. Credit institutions.

c. Financial Institutions: business debt agency companies, leasing companies, payment instrument issuing and management companies, credit granting companies, loan and credit management companies, payment institutions and electronic money institutions.

d. Public sector bodies to the extent that the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority delegated to them.

7. **Automated decision making:** no automated decision making is carried out within the framework of the file on lost - stolen identity cards and passports, nor does profiling take place.

D. ARCHIVE OF CONTRACTS OF COMMERCIAL ENTERPRISE (DECISION no. 6/06 of the HDPA)

1. **Purpose of processing:** To reduce fraud at the point of transaction using credit, debit or other cards and to ensure a safer environment for such transactions.

2. **Legal basis:** The legitimate interest pursued by the recipient of the data to ensure a secure environment for its customers - cardholders to use their cards and the fulfilment of their obligation towards international card organizations (e.g. VISA, MASTERCARD, etc.).

3. **Data Categories:** Data on complaints concerning contracts between banks and businesses for the acceptance of credit cards for specific reasons, which constitute unconventional or illegal behavior on the part of the business (e.g. acceptance of stolen or counterfeit cards, bogus transactions, "transaction splitting", etc.). The data (surname, name, patronymic, ID number, VAT number, full address) of the business representatives (up to 4) are also recorded in the file, while data on card transactions and cardholders are not recorded.

4. **Data sources:** Credit institutions, Card Issuing and Management Companies, Payment Institutions and Electronic Money Institutions.

5. **Retention periods:** Data shall be kept in the file for five (5) years from the date of the complaint.

6. **Data recipients:** The data in the file shall be made available for private use exclusively to the departments of credit institutions, payment instrument issuing and management companies, payment institutions and electronic money institutions responsible for concluding contracts for the acceptance of cards with businesses.

7. **Automated decision making:** no automated decision making, or profiling takes place in the context of the file on terminated commercial business contracts.

¹⁴ An impact assessment report is also being prepared for inclusion in the list of legitimate beneficiaries and microcredit providers

E. FILE OF ASSIGNED CLAIMS ARISING FROM CONTRACTS/CERTIFICATES OF PERFORMANCE OF PUBLIC PROCUREMENT CONTRACTS

- 1. Purpose of processing:** Protection of credit, resolution of transactions and limitation of fraud in banking transactions.
- 2. Legal basis:** The legitimate interest pursued by the recipient of the data, and in particular the transferee, in the assignment to him of real and legitimate claims.
- 3. Data Categories:** Data on claims against the Greek State, legal entities governed by public law, local authorities, etc., assigned to credit and financial institutions, arising from public procurement contracts and/or certifications of their execution, in whole or in part.
- 4. Data sources:** Credit institutions.
- 5. Retention periods:** The data are kept on file for three (3) months from the date of full payment of the assigned debt.
- 6. Data recipients:** The data in the file are made available for private use exclusively to the departments of the credit institutions responsible for financing secured by assignments of public procurement contracts and their implementation.
- 7. Automated decision making:** no automated decision making or profiling takes place within the framework of the file of assigned receivables from public procurement contracts/certificates of performance.

F. COMPANY FILE OF DATA FROM THE FEK (GOVERNMENT GAZETTE) AND GEMI (BUSINESS PORTAL)

- 1. Purpose of processing:** To ensure the exercise of the recipients' rights to freedom of information and economic freedom and to facilitate the fulfilment of their obligations by making available to them data published in the FEK and the GEMI.
- 2. Legal basis:** the legitimate interest pursued by the recipient of the data: timely, easy and accurate information for the identification of his counterparties and their valid constitution, operation and representation and, consequently, the security of transactions.
- 3. Data Categories:** The published acts and the company data published therein, relating to the establishment of a branch of foreign companies, amendment of the articles of association, transformation, merger, division, dissolution, revival and other acts published as mentioned above are recorded and include, as an indication, the sheet number and date of the Government Gazette (for earlier pre-GEMI publications), the code number (KAK) and the date of registration in the GEMI, the GEMI and ARMAE numbers and VAT number of the company, its legal form, name, distinctive title and registered office, the share capital, the number of shares/shares, the number of members of the Board of Directors/shareholders, the term of office of the Board of Directors, but also the members of the Boards of Directors, the managers and partners of the legal persons who are legally required to make the above publications, their shareholding percentages, as well as the published annual financial statements of the companies (balance sheets, etc.).-On the basis of the published financial statements, TIRESIAS produces data on key financial ratios and indicators.
- 4. Data sources:** The Government Gazette and the Business Portal.

5. **Retention periods:** Data related to directors, managers and partners are kept for ten (10) years from the date of publication of the relevant Official Gazette or entry in the General Register of Companies.

6. **Data recipients:** The data in the file shall be made available for private use to the following recipients¹⁵:

α. Bank of Greece.

β. Credit institutions.

c. Financial institutions: business debt agency companies, leasing companies, card issuing and management companies, credit granting companies, payment institutions, electronic money institutions and loan and credit management companies.

d. Public sector bodies to the extent that the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in them. e. Operators - recipients of the TSEK.

7. **Automated decision making:** within the framework of the company data file from the FEK and GEMI, no automated decision making takes place, nor does profiling take place.

G. AUCTION PUBLICATIONS WEBSITE DATA ARCHIVE

1. **Purpose of processing:** To facilitate the monitoring of auction publications and court judgments in the Judicial Publications Bulletin (JPB).

2. **Legal basis:** the legitimate interest pursued by the data recipient: to ensure easy and accurate information on the data published in the Judicial Publications Bulletin (JPB).

3. **Data Categories:** The data published in the abovementioned Bulletin related to auctions of movable and immovable property, continuation declarations, property descriptions and valuations, court judgments relating to auctions of movable and immovable property and any other act published in the JPB.

In addition, the electronic document (pdf) that is posted on the JPB and accompanies the above publications is also included in the file.

4. **Data sources:** The data are taken from the auction publications website of the Judicial Publications Bulletin of the National Fund for the Legal Profession (formerly the Legal Fund) <https://deltio.tnomik.gr/>

5. **Retention periods:** The data are kept for seven (7) days.

6. **Data recipients**¹⁶: The recipients of the data are credit and financial institutions (business debt agency companies, leasing companies, payment instrument issuing and management companies, credit institutions, payment institutions, electronic money institutions and loan and credit management companies).

¹⁵ An impact assessment report is also being prepared for inclusion in the list of legitimate beneficiaries and microcredit providers

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7. **Automated decision making:** no automated decision making, or profiling takes place within the auction publication website data file.

H. SCORING SYSTEM OF CREDIT BEHAVIOR

1. **Purpose of processing:** to provide an overall and more accurate assessment of the credit risks incurred or assumed, to assess the likelihood of recovery or deterioration in creditworthiness and thus to reduce the level of risk.

2. **Legal basis:** The legitimate interest pursued by the recipient of the data in the conclusion and performance of contracts under which credit risks are assumed, their mitigation and compliance with the legal obligations involved.

3. **Data categories:** The behavior scoring corresponding to a specific probability of default on a financial obligation during the next twelve (12) months, based on the statistical assessment of past transaction behavior.

(A) The probability of default over the next twelve (12) months in the TIRESIAS system is assigned to a numerical scale from 1, which is the worst value, to 600.

(B) The probability of recovery over the next twelve (12) months, shall be expressed from the lowest recovery scale D to the highest AA.

(C) The probability of deterioration over the next three (3) months from F, which is the worst value, to A.

The processing and scoring models shall be regularly reassessed and their algorithms updated in order to adapt them to current economic conditions and evolving trading practices and to confirm the accuracy of the estimates.

4. **Data sources:** Data from the DFO & MPS and CCS files processed by specific statistical models for the analysis of past transactional behavior of natural and legal persons.

5. **Retention periods:** In the OnLine system, the scoring for each Economic Unit is calculated ad hoc each time the user requests it. The calculated score is kept for two (2) years (consecutive).

In the automatic communication system (via IBM MQ or web service), the scoring is calculated at the end of each month for all the Economic Units in the file but is made available to the recipients after a request for a specific Economic Unit(s). In addition, on a daily basis, the scoring is recalculated for those Economic Units that show a change in their data (DFO, CCS, Searches). The calculated rating is kept for two (2) years (consecutive). It is planned that the calculation of the grading in the automatic communication system will be carried out in the same way as in OnLine.

6. **Data recipients**¹⁷: The TIRESIAS Credit Rating System was developed and operates on behalf of credit and financial institutions, on the basis of specifications agreed upon by inter-bank working groups involving specialized executives from the banks' credit risk assessment units. The recipients of the system are exclusively the credit and financial institutions (commercial agencies, leasing companies, card issuing and management companies, credit companies, payment

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institutions¹⁸, electronic money institutions¹⁹ and loan and credit management companies), which evaluate the rating and take a decision on whether or not to grant (initial or refinancing) in conjunction with the other information available to them and the granting policy.

It should be noted that the specific rating and profiling process does not imply the granting or not of a loan or credit by the credit or financial institution(s) to which you have applied or will apply, each of which decides on the basis of the other data available to it (e.g. income, etc.) and its policy.

Indicative factors which may influence the above assessment are:

- The existence of arrears in repayment of loan debts.
- The existence of default data on financial obligations in the relevant file (DFO above under B.I.3.1.).
- Consistency in the payment of debts from grants.

In order to prevent the adverse financial consequences of the pandemic due to covid 19 and the consequent strengthening of debtors, TIRESIAS, at the request of the Banks, will, from May 2020, also show in its file the calculated score for each Economic Unit for the month of February 2020, i.e. the last month before the pandemic.

7. Automated decision making: in the context of the scoring file, automated decision making is carried out by TIRESIA SA, while profiling also takes place.

We further inform you of the following:

- Data from the DFO & MPS and CCS files processed by specific statistical models constitute objective and verified data of economic nature and as such are suitable for the scoring. No other categories of data are introduced in these models.
- By using the data in the above-mentioned file, the recipients mentioned fulfil specific and explicit obligations to limit and manage the credit risks they assume
- In the event that you consider that data included in the records of the DFO, MPS and CCS concerning you are inaccurate or that new data are considered to exist that have not been taken into account, we encourage and ensure that you exercise your right to correct and complete incomplete data in order to mitigate the risk of producing erroneous adverse conclusions and unjustified discrimination against you.
- The retention period is limited to the minimum in order to disregard older and possibly outdated economic data.
- The effectiveness of the Scoring System is monitored, evaluated and checked periodically both by an external independent organization and by the competent internal departments at least every six months, in order to ensure as far as possible its statistical reliability and the accuracy of the assessment of the probability of default in a dynamic and changing context (economic environment and data).
- Every month all the scores produced by TIRESIAS, after being pseudonymized (pseudonymization process), are sent to the Development Department of TIRESIAS, in order to

¹⁸ As long as they provide faith

¹⁹ As long as they provide faith

carry out the necessary statistical studies for monitoring, evaluation and confirmation of the statistical reliability of the models that produce the scores. The pseudonymized scores are kept for two (2) years. Based on the results of the monitoring, TIRESIAS shall immediately take all the actions required in the management of the System (adjustments of statistical models or re-development, if necessary).

- TIRESIAS S.A., especially in relation to the data of the Scoring System of Credit Behavior, informs you that it ensures the exercise of the right to object for reasons related to your particular situation and each data subject may request the non-transmission of all the data of the Scoring System of Credit Behavior to the recipients of the data of these files. In this case, a request from the data subject is required in which he or she expresses his or her objection to the transmission of data concerning him or her.

- By granting the request:

A) In the place of the data in the file in question, the indication "does not wish the transmission of its credit score" will appear, an indication freely assessed by the recipients with any possible consequences.

B) If the non-transmission relates to the Default and Mortgages – Prenotations to Mortgages and/or Credit Consolidation System, the subject's credit conduct score will not be calculated.

c) If the non-transmission relates to the File of Default of Obligations and Mortgages-Prenotations to Mortgages, any existing or imposed in the future based on no. 234/11.12.2006 (Topic 23) decision of Banking and Credit Issues Committee of the Bank of Greece (FEK B' 63/25.01.2007)

as in force and the relevant decisions of the Banks, an administrative measure of withdrawal of a cheque book will appear in the above file, but without detailed information on the cheques under which it was imposed.

- The data subject may at any time submit a request to lift the non-transmission of data of the above files.

I. DATA ON APPLICATIONS FOR OUT-OF-COURT SETTLEMENT OF BUSINESS DEBTS UNDER L.4469/2017]

1. Purpose of Processing: Fulfilling the role of TEIRESIA as a hub (Article 3 paragraph 4, 5 paragraphs 3,4,7B and 13, 7 paragraphs 6 and 8, 8 paragraphs 11 and 26 of JMD no. 116821/25.10.2017) or the transmission of data between the Special Secretariat for Private Debt Management ("SSPDM"), the Independent Public Revenue Authority (IPRA), the Centre for the Collection of Insurance Debts (CCID) and credit and financial institutions for the implementation of L.4469/2017, as amended, codified and applies. Facilitation of credit and financial institutions to identify the best proposal for the restructuring of the applicant's debts, based on Article 17 of L.4469/2017. Reduction of the possibility of fraud against the banking system, the IRPA, the CCID and the SSPDM regarding both the persons eligible to apply for the out-of-court debt settlement mechanism and the claims that can be settled by the debt restructuring agreement. Protecting commercial credit and ensuring a safer environment for such transactions. Avoiding the administrative burden on the authorities and entities involved from the applications submitted although they are outside the scope of L.4469/2017 and, accordingly, speeding up the procedure for the settlement of debts covered by the law.

2. Legal Basis:

- Legitimate interest of credit and financial institutions (limitation of fraud, protection of trade credit and security of transactions, consolidation of financial transactions)
- Legal obligation to comply with the L.4449/2017 and the relevant Ministerial Decisions (in particular the Joint Ministerial Decision of the Ministers of Economy and Development - Finance/FEK B'3909/6.11.2017 No. 116821/25.10.2017, hereinafter referred to as "JMD"),
- The consent included in the debtor's application for the disclosure, processing and cross-referencing by the parties involved in the procedure of the data contained in the application and its accompanying documents, as well as those in the possession of the participating creditors and the lifting of banking and tax secrecy (L.4469/2017, Article 5, paragraph 6).

3. Data Categories: According to Article 3 paragraph 4, Article 5 paragraphs 7B and 13, Article 7 paragraphs 6 and 8 and Article 8 paragraphs 10 and 25 of Joint Ministerial Decision the platform of SSPDM (Special Secretariat for Private Debt Management) retrieves data from the database of TIRESIAS, both for the purpose of verifying the debtor's inclusion in the scope of application of L.4469/2017, as well as for the confirmation and/or completion of the data entered by the latter and for a more complete representation of the debts and collateral. The relevant messages are transmitted electronically (via web service) between the electronic platform of SSPDM and the electronic platform of TIRESIAS, to which the credit and financial institutions are mutually connected. The messages include the following data categories:

- Identification data of the debtor (VAT number, surname/name, patronymic, type and number of identification document), the existence of overdue debts, the sealing of cheques due to insufficient balance and the issuance of a payment order against the debtor as of 31.12.2018, as well as debt adjustment. (Message A)
- Detailed information on the debts and collateral of the professional debtor in question (details of creditors, debtor and any co-debtors, debts, collateral, collateral security, collateral security, bank deposits, remittances, investment products, portfolio (Message C for freelancers).

4. Data sources: The data are collected from the debtor's application and the supporting documents, the TIRESIAS' file on the DFO and CCS and the credit and financial institutions.

5. Retention periods: Data concerning applications of L. 4469/2017 are maintained as follows:

- a) for three (3) years from the drawing up of a failure record, if no out-of-court debt settlement is reached,
- (b) for three (3) years from the termination of the restructuring agreement in any way (repayment, termination, cancellation, etc.),
- c) for three (3) of the waivers of the application for affiliation and
- (d) for three (3) years from the last entry of information on a pending application.

6. Recipients of Data:

- The Special Secretariat for Private Debt Management (SSPDM).

- The Independent Public Revenue Authority (IRRA)
- The Centre for the Collection of Insurance Debts (CCID)
- The credit and financial institutions involved in the procedure in accordance with the applicant's application and L.4469/2017.

7. **Automated decision making:** no automated decision making takes place within the framework of the file of applications for out-of-court settlement of business debts, nor profiling takes place.

J. PERSONS CARRYING OUT THE PROCESSING

Access or accessibility (where applicable) to all or part (where applicable) of your personal data shall be granted, subject to absolute confidentiality and limitation of processing to the minimum necessary in each case, to the following categories of our associates who, under relevant contracts, carry out processing operations on behalf of and for the account of TIRESIAS:

- Companies providing consultancy services and/or developing IT applications for the needs of developing new services
- Companies of chartered accountants for carrying out audits
- Companies managing (storing, destroying, etc.) physical records to meet the relevant need for the management of applications submitted to us
- Companies providing computer centers for the hosting needs of our systems
- Courier companies for the needs of collection, transport and delivery of correspondence between us
- Companies providing support and maintenance services for equipment, infrastructure, applications, software and information systems to meet the related needs and security testing (e.g. penetration tests).

When the relevant outsourcing contracts are signed, every measure shall be taken to ensure that the processors comply with the legislation on the protection of personal data, in accordance with the requirements of Article 28 of the General Data Protection Regulation.

J-I Application Platform of Law 3869/2010

TIRESIAS acts as the processor on behalf of credit and financial institutions for the purpose of a more complete, comprehensive and efficient processing of applications and decisions to be included in the L.3869/2010, as in force, for the exchange of data of debtors who have applied for inclusion in Law 3869/2010 (under paragraph 2c of Article 4 of L.3869/2010 and Article 17 of L.4469/2017) between creditors-credit institutions for the purpose of preparing joint proposals for viable arrangements with the other participating banks. For this purpose, it processes data of unsealed applications and decisions, data of payments according to the decisions (amount and number of instalments, amount of debt to be written off), detailed data of debts and collateral of the specific debtor (data of creditors, debtor and any co-debtors, debts, collateral in trade, collateral security, bank deposits, remittances, investment

products, share portfolio). The data are collected from the debtor's application and the supporting documents, the court decision that may have been issued on the application, the TIRESIA's file on the DFO and CCS and the credit and financial institutions.

J-II Application Platform of Law 4469/2017

TIRESIAS processes debtor data on behalf of credit and financial institutions through a system that helps to better manage and distribute workload, as well as store documents, with the aim of optimally managing information and the flow and organization of workload in the interest of the Banks involved (Case Management System "CMS").

TIRESIAS, through its authorized personnel, registers data into a spreadsheet (xls. tool) in the CMS, which highlights the best proposal for the restructuring of the applicant's/debtor's debts by the Banks involved, which is provided to the credit and financial institutions on an advisory basis. The purpose of this processing is to facilitate the Banks in preparing the best proposal for restructuring the applicant's debts on the basis of the possibility of cooperation provided by the provision of Article 17 of L.4469/2017.

J-III Application Platform of L.4605/2019

TIRESIAS acts as the processor on behalf of credit and financial institutions for the purpose of a more complete, comprehensive and efficient processing of applications under L. 4605/2019 and the fulfilment of their obligations arising from them. The L.4605/2019 enabled natural entities with or without bankruptcy capacity to apply for the adjustment of their debts in order to protect their main residence from forced liquidation, in accordance with the specific provisions of the law. In accordance with par. 10 of Article 72 of the aforementioned Law, by applying for the protective provisions of the Law, the applicant authorizes the participating creditors and the State to access, process and cross-check the data contained in the application and the accompanying documents, as well as other data in the possession of the participating creditors for the purposes of the overall procedure. Such authorization shall entail the lifting of the secrecy of bank deposits as referred to in Article 1 of L.1059/1971, A' 270) and the tax secrecy of Article 17 of L.4174/2013 (A' 170) in accordance with the provisions of this Law. In this context, TIRESIAS has undertaken the development of the functionality for the management of the applications submitted, the support of the production environment of the Electronic Platform for the Protection of the Principal Residence (EPPPR), the support in the retrieval of tax data from the EPPPR, the transmission of the mutual messages between the electronic platform of the ΕΓΔΙΧ and the credit and financial institutions for the purpose of recovering the tax data referred to in par. 8 of Article 72 of L.4605/2019, etc.

J-V. Pending Applications Platform of L.3869/2010 (L.4745/2020)

TIRESIAS acts as processor on behalf of credit and financial institutions for the purpose of a more complete, comprehensive and efficient processing of pending applications under Article 4A of L.3869/2010 as added by L.4547/2020, according to which applications for debt adjustment pending at first instance and whose hearing was determined after 15.6.2021 shall be submitted for hearing by the applicant, under penalty of inadmissibility, by submitting an application for re-determination through the electronic platform of the SSPDM.

The above application shall include, inter alia, a statement that the applicant consents to the lifting of the secrecy of his banking and tax information, in accordance with Article 17 of

L.4174/2013 (A' 170), while the creditors use the electronic platform for the purpose of exercising the rights referred to case c' of paragraph 2 of Article 4 and paragraph 2 and 3 of Article 10 of L.3869/2010, without the assistance of the public prosecutor's office, if a petition under Article 4 of L.3869/2010 is pending against the creditors. In this context, TIRESIAS has undertaken the transmission of messages between the credit and financial institutions and the above electronic platform for the recovery of the claims referred to in paragraph 3 of article 6 of the joint decision no. 136042 "ΕΞ 2020" of the Ministers of Finance, Justice and State Government (Government Gazette No. 5278/30.11.2020).

The above data (J-1 to J-V) shall be kept by TIRESIAS for six (6) months from the completion by the latter of the project assigned to it.

KA. DATA PROTECTION OFFICER (DPO)

The Company has appointed a Data Protection Officer in accordance with Article 37 of the General Data Protection Regulation (tel. 210 36.76.700, dpo@tiresias.gr, Alamanas 2 str., Maroussi 151 25).

KB. TRANSFER OF DATA TO A THIRD COUNTRY/ORGANISATION

TIRESIAS does not transfer your data contained in the above Files to third countries or international organizations.

In the exceptional case where a transfer of data to a third country or international organization is required, the transfer will be carried out in accordance with the relevant legislation, on the basis of an adequacy decision, appropriate safeguards or binding corporate rules. In the absence of the above, the transfer may be made subject to your prior consent. In any case, you will be informed (or, where applicable, provide us with your consent) prior to such transfer.

KC. DESTRUCTION OF THE PHYSICAL FILE OF APPLICATIONS

The physical file of all applications submitted to TIRESIAS shall be kept completely secured and shall be destroyed upon signature of a relevant protocol after ten years.

Returned/unclaimed registered letters from the Company to citizens shall be maintained at TIRESIAS for three (3) months from the date of their return. After this period, any interested party may receive only a copy. Returned/unrequested registered letters from the Company relating to the provision of an analytical data report to citizens shall be maintained at TIRESIAS for three (3) months from the date of their return.

Returned/unrequested original supporting documents shall be retained by TIRESIAS for ten (10) years from the date of the subject's request.

SUMMARY PICTURE OF TEIRESIAS (SET)

The legal entities shall be given electronic access, via the TSEK platform, to the data of the following Files concerning them. The data is provided by issuing a summary image showing the data held at the time of issue in the TIRESIA's Default (DFO), Mortgages& Prenotations to Mortgages (MPS) and Credit Consolidation System (CCS) related to the legal entity concerned, as derived from the combination of the data declared when the legal entity registered in the system. The issuance of the SET report shall be subject to the issuance of a unique access code (T-Code), different for each new transaction with the system.

The SET report shall not be a substitute for exercising the right of access to obtain a detailed report on the data held in the above-mentioned files.

A charge shall be made for the provision of the SET report and the T-CODE. The T-CODE shall be valid for 7 calendar days from the date of issue. Within this period, the same SET report may be reproduced up to five (5) times. Each SET report shall bear an issue time stamp. The purpose of the SET is, on the one hand, to provide interested parties with immediate information on data concerning them, without requiring their physical presence at the offices of TIRESIAS and, on the other hand, to provide this profile in financial transactions at the initiative of the interested party.

KD. EXERCISE OF RIGHTS OF SUBJECTS

You have the following rights:

A) Right of access

To know which personal data concerning you are held and processed by TIRESIA, their origin, the purposes for which they are processed and their retention period, either in a file or as a whole. Also, in the context of exercising your right of access, you may also request to be informed of the searches made concerning you by the recipients of our records in the last six months (number and origin), including the activation of the emergency alert in the event of the entry or deletion of data (alarm) concerning you. Finally, you can also request the production of your score and the main reasons for its formation.

B) Right to rectification

Request that your personal data be corrected and/or completed to make them complete and accurate. In this case, you must provide any necessary document demonstrating the need for correction or completion.

C) Right to restriction of processing

Request the restriction of the processing of your data. A manifestation of the right to restriction of processing is the right not to transfer data, as described below.

D) Right to Object

Refuse and/or object to any further processing of your personal data held by TIRESIA, including scoring (credit rating system).

E) Right to erasure ('Right to be Forgotten')

Request the deletion of your personal data from the records held by TIRESIA.

F) Right regarding Data Portability

Request the portability of your data, in accordance with the requirements as set by the General Data Protection.

In relation to the exercise of your rights the following are noted:

- The data that TIRESIAS registers in its records are absolutely necessary to serve the purpose of the processing, and the processing carried out by it and in general the retention

of the data is necessary for compliance with a legal obligation, but also for the purposes of the legitimate interests of the recipients of the data (which outweigh the rights and freedoms of their subjects) and the execution of a contract between them (credit and financial institutions, for whose financial behavior data files operate) and subjects. TIRESIAS has the right, in accordance with the above, to refuse your request for restriction of processing or deletion of your personal data if the request is not sufficiently substantiated, if the processing of the data is necessary in accordance with the law or for the establishment, exercise or support of its legal rights.

- Despite the above and despite the fact that this right is not provided by the GDPR, but was granted to the subjects under the regulatory framework of L.2472/1997 and the regulatory decisions of the Authority as a form of the right of objection provided for therein, if you wish Tiresias, may cease to transmit the data concerning you to the recipients of its files, transmitted henceforth a relevant indication (non-transmission of data).

The above right is a more specific manifestation of the right to restriction of processing (Article 18 GDPR).

- The exercise of the above rights is prospective and does not relate to data processing that has been already carried out.

G) Complaint Form

File a complaint in the Hellenic Data Protection Authority **if you consider that your rights are infringed in any way** (https://www.dpa.gr/index.php/el/polites/katagelia_stin_arxi).

In order to exercise your rights, our Company operates an Office for Public Services within working days from 8:30 to 14:00 (Alamanas 1 str., Marousi 151 25). During the working days, from 9:00 to 16:00, a telephone center operates on telephone number 210 36 76 700. In addition, you can submit with the relevant request in writing to the company's abovementioned address or electronically to the following email address tiresias@tiresias.gr, while useful information regarding the exercise of your upper rights is provided on the website of the TIRESIAS <http://www.tiresias.gr>.

TIRESIAS will reply to your request within thirty (30) days from its submission, with the exception of exceptional cases, therefore the above deadline may be extended for up to sixty (60) additional days if deemed necessary, taking into account the complexity of the request and/or the number of requests. In any case, TIRESIAS will inform you in time in case of a possible extension of the aforementioned deadline.

If your requests are manifestly unfounded or excessive in particular because of their repetitive nature, the Company may charge a reasonable fee, taking into account the administrative costs for providing the information or performance of the requested action or might refuse to follow the request.

For further information regarding the progress of your requests, you can call on working days and hours on the telephone 2103676700 (Directorate-General for Public Service).

KE. PROTECTION OF PERSONAL DATA

TIRESIAS S.A. implements a system of physical security and information security management system for the confidentiality of your personal data and their protection against accidental or unfair destruction, accidental loss, alteration, prohibited dissemination or access and any other form of unlawful processing. Indicative:

- The building where the engineering center, is guarded with security staff who records the incoming, while there is a closed circuit of television covering the entrance and the perimeter. At the same time, for access to critical spaces is essential to use a card and access rights.
- There is protection from viral software.
- Back-up procedures are applied.
- Records of operations are being kept (users, administrators, databases, operational).
- Access to its systems is strictly controlled by both internal and external users.
- Private Network is used, etc.
- It has drafted documents, policies and procedures that prove its compliance in accordance with the principle of accountability (privacy policy, cookies policy, recording of the type, categories and flows of personal data, compilation of processing files, impact assessment, etc.) as mentioned in the GDPR,
- undertake education and awareness-raising of employees regarding the protection of personal data.

KF. APPLICABLE LAW

We are processing your Data in accordance with the General Data Protection Regulation 2016/679/EU, the applicable Greek legislation on the protection of personal data, in particular Regulation L.4624/2019, as well as the regulatory administrative acts of the Hellenic Data Protection Authority.

Date of last renewal : February 2022