

# **General Data Protection Regulation GDPR**



# NOTICE FOR CUSTOMERS OF **ATTICA BANK SA** CONCERNING THE PROCESSING OF THEIR PERSONAL DATA IN ACCORDANCE WITH REGULATION (EU) 2016/679 AND THE RELEVANT GREEK LEGISLATION.

**ATTICA BANK SA**, which is based in Athens, at 3-5 Palaion Patron Germanou Str., (phone no. 210 3669000) (hereafter the "**Bank**"), in accordance with Regulation (EU) 2016/679 and the relevant provisions of the applicable Greek legislation on the protection of personal data, in its capacity as controller, informs its customers (hereinafter referred to as "**Customers**" or "**Customer**") that it or third parties, on its authorization and on its behalf, will process their personal data in accordance with the following:

## 1. Which personal data are collected by the Bank and from where?

**a)** Your identification data: name, surname, father's name and mother's name, ID card number, Tax Identification Number (TIN), AMKA, sex, nationality, date and place of birth, etc.

The data above are obtained directly from you and / or from publicly accessible sources and / or from publicly accessible social networks (e.g. facebook, twitter).

**b)** Your contact information: postal and e-mail address, landline and mobile phone, etc. The data are collected directly from you and / or from publicly available sources and / or social networks, as well as by debtor information companies co-operating with the Bank (Law no. 3758/2009), claims management companies (Law no. 4354/2015) or lawyers and law firms.

**c)** Your economic and financial data, your profession, earnings, dependents, E1 and E9 forms, clearance statements etc.

These data are collected either directly from you or upon your authorisation, or from publicly accessible sources, such as land registry offices, cadastral offices, etc.

**d)** Your health data and / or dependent family members submitted by you to the Bank, on your own initiative.

**e)** Data concerning the failure of your financial obligations (for example, unsecured checks, repayments of loan and credit agreements, payment orders, seizures and checks to be paid, claims and decisions on bankruptcy, etc.).

These data are collected by the Bank, in the context of your dealings with the Bank, from records of economic behavior, and in particular the company TIRESIAS SA (see below) or from publicly accessible sources such as Courts, etc.

**f)** Credit related data: your debts to credit and / or financial institutions on loans and / or credits.

These data are collected either by the Bank under your contractual relations with the Bank, or by other credit institutions, when permitted, or from records of economic behavior, and in particular TIRESIAS SA (see below).

**g)** Data concerning your credit scoring - credit profiling.

These data are either produced by the Bank from the automated data combination under (c), (d) and (e) above, or are collected by TIRESIAS SA (see below).

**h)** Data identifiers of the Customer's electronic identity, such as the IP Address.

**i)** Data of the Customer's telephone communications with the Bank recorded under the terms and conditions of the law.

**j)** Data relating to your transaction behavior arising and collected from the operation of your contract (s) with the Bank, as well as from the use of the Bank's products and services (e.g. your credit or debit cards), as well as from publicly accessible social networks.

**k)** Payment and payment service transaction data collected either from you or from your payment service provider. In such cases the transfer of your data to the Bank is deemed to be at your command and therefore with your consent to the transmitting provider, who is responsible for the completeness and accuracy of the relevant data.

**l)** Data about your knowledge and experience in the investment field, your financial situation, your level of risk tolerance, and your investment goals, which are collected directly from you.

**m)** Image data from the video recording systems of the Bank's premises, where the relevant statutory markings exist.

Please note that, except for your data under (a) and (b), which are strictly necessary for your transaction or contractual relationship with the Bank, the type and amount of other data collected depends in each case on the type of a contract that will either be concluded or existing with the Bank and / or the product or service offered or supplied.

The company under the name "Banking Systems Information SA" and the distinctive title "TIRESIAS SA" is responsible for the processing of economic behavior data on behalf of the country's banking system, with the main purpose of assessing the credit risk assumed by the credit institutions. The company is based at Alamanas Street, 151 25 Maroussi, has a telephone number: 210 3676700 and the address of the website is [www.teiresias.gr](http://www.teiresias.gr). You may be informed about the processing of your data by TIRESIAS SA, as well as the exercise of your rights at the above telephone number and / or the above site.

The Bank may collect data of the same categories as above and from other records of similar data that are lawfully operating in Greece or in another member state of the European Union.

## **2. Why do we collect your personal data and how do we process it?**

Your personal data above (Chapter 1) are subject to processing for the Bank to comply with the obligations imposed by the applicable legal, regulatory and supervisory framework, as well as the decisions of any public authorities or courts, as well as the defense of rights and fulfillment of the legal interests of the Bank, for the purposes listed below:

**a)** Data under (a) and (b) above to identify you and communicate with you at the stage of both your pre-contractual and contractual relationship with you (deposit or lending or investment), its execution and generally the smooth operation and fulfillment of our obligations to you.

**b)** In the case of granting any loan or credit, the data under (c) to (g) for:

**i.** the credit risk assessment that the Bank is called upon to undertake or has already undertaken,

**ii.** tracking the progress of the debt,

**iii.** prevent or limit the likelihood of your obligations under your contract / contracts with the Bank being breached; and

**iv.** the pursuit of collecting any amounts owed to the Bank from the operation of your contract (s) with it.

To meet this goal, we may take some automated decision-making, including credit profiling, based primarily on the above data and the use of appropriate models.

**c)** The data under (d) above to support your requests for loans or special purpose loans, or to settle your outstanding debts, to evaluate them and to prepare the relevant contractual documents.

**d)** Data, such as primarily under (h) and (k) above, to prevent and combat money laundering and terrorist financing and to prevent fraud against the Bank or its other customers, as well as any other illegal act. For this purpose, automated systems and related models are used in accordance with relevant international standards.

**e)** Data, such as above under (i) and (m) above, for the security of transactions and the protection of the property, safety and physical integrity of employees and customers or visitors of the Bank.

**f)** The data under (j) above to inform you about the best use of our products and / or services and their improvements and on the other hand products and / or services of the Bank and its Group companies, in addition to what you already use, or with companies that partner with the Bank, with or without the formation of a trading profile, using appropriate models (provided that you have provided your consent to that effect where necessary) and sending you a customer satisfaction questionnaire for the products and services provided by the Bank, as well as the level of service of our Customers.

**g)** The data under (k) above for the execution of payment transactions activated by you or on your order.

**h)** The data under (l) above for the provision of investment products or services to you upon your request.

### 3. Who do we send your personal data to?

Your personal data may be forwarded to the following persons:

**a)** To the employees of the Bank who are responsible for the assessment of your applications, the management and operation of your contract (s) with the Bank, in order to fulfill the obligations arising therefrom, and the relevant obligations imposed by law.

**b)** To entities in which the Bank entrusts the performance of specific tasks on its behalf (processing), such as debtor information agencies (Law no. 3758/2009), loan and credit claims management companies (Law no. 4354/2015), lawyers, law firms, notaries and bailiffs, consultants, experts, natural or legal persons, and data processing companies for purposes of checking and updating them (including updating your contact information if you have failed to notify the relevant change to the Bank), reassessment of the risk, categorization of the contracts and debts arising therefrom, processing of settlement proposals, etc. on behalf of the Bank, as well as IT Service Providers, subject to keeping confidentiality in all cases.

- c)** To credit and / or financial institutions with a registered office in Greece or abroad, which have obtained the required operating license and operate legally, as well as companies or special purpose vehicles within the meaning of Law 3156/2003 on the securitization of receivables, as applicable.
- d)** To debt-acquiring companies in accordance with Law no. 4354/2015, as applicable, as well as entities in the broader financial sector, including domestic or foreign investment companies, in the event of assignment of claims arising from loan agreements.
- e)** To companies in the Group's financial sector, in order to estimate the total risk assumed, to meet the supervisory obligations and to treat the Group's customers in a unified manner.
- f)** To credit institutions and / or payment service providers domestically or abroad, to execute a contract with you or transactions you have requested or made, such as SWIFT, SEPA, VISA, MASTERCARD, etc.
- g)** To supervisory, independent, judicial, public and / or other authorities within their sphere of responsibility.
- h)** To TIRESIAS SA for data relating to the records held by it and specific data relating to unsecured checks, unpaid bills of exchange, unpaid bills of lading, repayments of loan or credit agreements, loan and credit agreements and their development, as well as contracts for the provision of guarantees, etc., for the purposes of the aforementioned purpose, as well as for the purposes of the Tiresias Risk Control System (TSEK), as detailed on the website of the aforementioned ([www.teiresias.gr](http://www.teiresias.gr)).
- i)** To co-financing or guarantee institutions, where appropriate, such as ETEAN, the Greek State, etc.
- j)** To companies that process your data on behalf of the Bank for the purpose of promoting products and / or services.

## **4. Transmission of your personal data to third countries outside the EU.**

We may transmit your personal data to third countries, outside the EU in the following cases:

- a)** if an implementing act of the European Commission has been issued for an adequate level of protection of personal data in the country concerned; or
- b)** provided you have given your explicit consent to the Bank, or
- c)** if the transmission is required to execute a contract with you (e.g. executing a transfer order to a bank account of a third-country financial institution), so that the data necessary for that purpose will be transmitted to the agencies which are necessarily involved (e.g. SWIFT, SEPA, correspondent bank, etc.), or
- d)** where there is an obligation on the part of the Bank by a law or a transnational contract or judicial decision, or
- e)** in the context of the Bank's compliance with the rules on the automatic exchange of information in the field of taxation, as derived from the international obligations of Greece, or

**f)** where the transmission is necessary for the establishment or exercise of rights of the Bank or for the defense of its interests.

Please note that, in particular, to fulfill the obligations under (d) or (e) above, we may transmit your personal data to competent national authorities to be forwarded through them to the respective authorities of third countries.

## **5. How long do we keep your personal data?**

In the event that a contract with the Bank is entered into, your personal data will be retained until the statutory time limit for the general limitation of claims, i.e. for a period of up to twenty (20) years from the expiration of the relevant contract in any way.

If until the end of the twenty (20) years there are ongoing legal proceedings with the Bank or any affiliated company with it, which directly or indirectly concern you, this retention period of your personal data will be extended until an irrevocable court order is issued.

In the absence of a contract with the Bank, your personal data will be kept for five (5) years from the rejection of the application.

In the event that the law or regulatory acts provide for the retention period of your personal data to be shorter or longer, the above data retention time will decrease or increase accordingly.

Documents bearing your signature and to which your personal data has been registered may, at the sole discretion of the Bank, be kept electronically / digitally after five (5) years.

## **6. What rights do you have to protect your personal data and how can you exercise them?**

**l)** You have the following rights to protect your personal data:

**a)** To know what personal data we keep and process, their origin, purposes of their processing, data recipients, and the time they are retained (right of access).

**b)** To request the correction and / or completion of your personal data so that it is complete and accurate (right of rectification). In these cases, you must provide any necessary documents that may indicate the need for such correction or completion.

**c)** To request the limitation of your data processing (right of restriction).

**d)** To refuse and / or oppose any further processing of your personal data we retain (right of appeal).

**e)** To request the deletion of your personal data from the files we hold (right to erasure).

**f)** To request the transfer of your personal data to any other processor of your choice (right to data portability).

Please note the following in relation to your above mentioned rights:

The satisfaction of your rights under (c), (d) and (e) insofar as it relates to data necessary for the preparation and / or continuation of the operation of the contract (s), irrespective of the source of their collection, results in the automatic termination thereof.

The Bank may in any case have the right to refuse the satisfaction of your request to restrict the processing or deletion of your personal data if the processing or retention of the data is necessary for the establishment, exercise or support of its legal rights or the fulfillment of its obligations.

Exercising the right to portability (above under f) does not entail the deletion of your data from our records, which is subject to the terms of the immediately preceding paragraph.

The exercise of these rights acts for the future and does not concern data processing already carried out.

**g)** To submit a complaint to the Personal Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)) if you believe that your rights are being infringed in any way.

**II)** For the exercise of these rights, as well as for any matter concerning your personal data, you may address the Bank in writing to the following address: Attica Bank, Data Protection Office, 3-5 Palaion Patron Germanou Str., Athens 105 61, or to the e-mail address: [dpo@atticabank.gr](mailto:dpo@atticabank.gr).

In such cases we will make every effort to respond to your request within thirty (30) days of its submission. This period may be extended for up to sixty (60) additional days, if deemed necessary by the Bank's absolute discretion, taking into account the complexity of the request and the number of requests, so we will inform you accordingly within the aforementioned period of thirty (30) of days.

Exercising your rights does not entail any charge. If however, your requests are obviously unfounded, excessive or recurrent, we may either ask you to bear the relevant costs for which we will inform you or refuse to respond to them.

## 7. How do we protect your personal data?

The Bank for the security of your data has and applies procedures and systems for the confidentiality of your personal data and processing, as well as for protecting them from accidental or unlawful destruction, accidental loss, alteration, prohibited propagation or access and any other forms of unfair processing, including access controls, physical and reasonable security, data loss prevention and backup outside of the Bank.

The above notice replaces any previous notice concerning the processing of your personal data.

Learn more about the **General Data Protection Regulation GDPR:**

- at any of our branches
- at **[www.atticabank.gr](http://www.atticabank.gr)**



210-3669000



[www.atticabank.gr](http://www.atticabank.gr)



In more than 70 locations all over Greece



**attica bank**