

# **General Data Protection Regulation GDPR**



# NOTICE FOR SHAREHOLDERS 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 23, Omirou Str., (phone no. 210 3669000) (hereafter the "**Bank**") hereby informs you as shareholders of the Bank, pledged creditors, heirs of shareholders and those with voting rights, 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 that it or third parties on its authorisation and on its behalf, will process your 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.
- b)** Your contact information: your postal and e-mail address, telephone number, (fixed, mobile) etc.
- c)** Number of shares.
- d)** Bank account details.

The above data are collected either directly from you or from third parties authorised by you or third legal entities associated with you, or from the company "Central Securities Depository SA".

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

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)** For your identification.
- b)** To communicate with you.
- c)** In order to control the possibility and lawfulness of the exercise of your rights as shareholders of the Bank, in accordance with Law no. 2190/1920 on public limited companies, as in force (participation in the General Meetings of the Bank, exercise of the right to vote in them, registration in the shareholders' register, fulfillment of the legal obligations of the Bank, etc.).
- d)** The fulfillment of the Bank's obligations to you as shareholders (e.g. payment of a dividend).

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

Your personal data may be forwarded to the following persons:

- a)** The management of the Bank and / or the employees of the Bank who are responsible for your identification and control of the lawfulness of the exercise of your rights as shareholders of the Bank.
- b)** Attorneys-at-law, law firms, bailiffs, consultants, experts, in any case of legal proceedings concerning the capacity of shareholder of the Bank or preliminary investigations or criminal investigations or prosecutions in any way related to your above-mentioned capacity.
- c)** To natural 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), as well as IT Service Providers, subject to keeping confidentiality in all cases.
- d)** To the company "Central Securities Depository SA".
- e)** To supervisory, independent, judicial, public and / or other authorities within the scope of their authority.
- f)** To other shareholders and officers of the General Meeting.

### 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)** where there is an obligation on the part of the Bank by a law or a transnational contract or judicial decision, or
- d)** 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 (e.g. FATCA), or
- e)** 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?

Your personal data will be kept for as long as you remain shareholders of the Bank.

In the event that you lose your shareholding for any reason, your data will be retained until the statutory time limit for

the general limitation of the claims, i.e. for a period of up to twenty (20) years from the expiry of your shareholder relationship with Bank in any way.

If until the end of the twenty (20) years there are legal proceedings under way with the Bank, this retention period of your personal data will be extended until an irrevocable court order is issued.

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

**I)** 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, the 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).

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

✓ The Bank may in any case have the right to refuse the satisfaction of your request to limit the processing or deletion of your personal data if the processing or maintenance of such data is necessary for you to continue to be shareholders of the Bank, for the exercise of your rights as shareholders as well as for the establishment, exercise or support of the Bank's statutory rights or the fulfillment of its obligations to you as shareholders of the Bank.

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

**f)** 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, 23, Omirou Str., 10672 Athens, Data Protection Office, 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

