

## INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA THROUGH A VIDEO SURVEILLANCE SYSTEM

### 1. **Responsible for processing:**

ATTICA BANK BANKING SA, based in Athens, at 23 Omirou Street, P.C. 106 72 (Tel. 210 3669000).

### 2. **Purpose of processing and legal basis:**

We use a surveillance system for the purpose of protecting persons and goods. The processing is crucial for the purposes of lawful interests that we pursue as a processor (GDPR, Article 6, par. 1).

### 3. **Analysis of lawful interests**

Our lawful interest consists in the need to protect our premises and the property located in it from illegal acts, indicatively theft. The same applies to the safety of life, physical integrity, health as well as property, employees, our customers and third parties who happen to legally be in the area under surveillance. We only collect image data and limit the collection to specific areas of the premises with appropriate signage in a visible spot, mainly at the entry and exit points as well as in the places where financial transactions take place, in which we have made the assessment that illegal acts are highly likely to happen. We do not receive images or focus on places where people's privacy may be immoderately restricted.

### 4. **Receivers**

The retained material is accessible only to our competent / authorized personnel who are assigned to preserve the security of the premises. This material is not transferred to third parties, except in the following cases:

(a) to the competent judicial, prosecutorial and police authorities, when it contains information that is necessary for the investigation of a criminal offense involving persons or property of the processor

b) to the competent judicial, prosecutorial and police authorities when they lawfully ask for data within the context of performing their duties

(c) to the victim or perpetrator of a criminal offense, when it comes to data which may constitute evidence of that offense

d) to the cooperating companies that provide security services and surveillance and security systems, which, in the context of providing their services, process your data on behalf of the Bank. These cooperating companies that act as processors have been informed and are committed in advance to keep the confidentiality of the data, are aware of and follow the Bank's guidelines regarding the processing of personal data and take all necessary measures to protect them.

### 5. **Compliance time**

We retain the data for forty-five (45) days. After this period elapses, they are automatically erased. In case we identify an incident during the said period, we isolate part of the video and retain it for another (1) month, with the aim to investigate the incident and commence legal proceedings to defend our lawful interests. If the incident concerns a third party, we might retain the video for up to three (3) more months.

### 6. **Rights of data subjects**

Data subjects have the following rights:

- Right of access: you have the right to know if we are processing your image and if so, to receive a copy thereof.
- Right to restrict processing: you have the right to ask us to restrict the processing of your data, for example, not to erase data that you believe to be necessary for the establishment, exercise or support of your legal claims.
- Right to object: you have the right to object to the processing of your data.
- Right to erasure: you have the right to request that we erase your data.

For the exercise of your aforementioned rights, as well as for any matter regarding your personal data, you can contact the Bank in writing in this address: Attica Bank, Data Protection Office, 23 Omirou St., 10672, Athens, or at the e-mail address: [dpo@atticabank.gr](mailto:dpo@atticabank.gr) or at our Branch network.

In order for us to process a request related to your image, you must first bring forward proof of your identity. Then you need to identify to us approximately the time that you were within range of the cameras and provide us with a picture of you to facilitate the location of your data and hide the data of third party images. Alternatively, we give you the opportunity to come to our premises so that we can show you the images in which you appear.

You should be aware that the exercise of the right of objection or erasure does not entail the immediate erasure of data or modification of the processing.

We will do our best to respond to your request within thirty (30) days of submission. This deadline may be extended for sixty (60) more days, if the Bank, at its sole discretion, finds this necessary, taking into consideration the complexity of the request and the number of requests. Therefore, in this case, we will let you know within the said deadline of thirty (30) days.

### 7. **Right to make a complaint**

In the event that you deem that your rights have not been sufficiently satisfied or that the processing of the data that concern you violates EU Regulation 2016/679, you maintain the right to submit a complaint to a supervisory authority.

The competent supervisory authority for Greece is the Authority for the Protection of Personal Data, 1-3 Kifissias Avenue, 115 23, Athens, <https://www.dpa.gr/>, Tel. 2106475600.