

PROCESSING AND REPORTING TO GREEK TAX AUTHORITIES OF CLIENT INFORMATION IN COMPLIANCE WITH COMMON REPORTING STANDARD (CRS) OF ORGANISATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT (OECD).

Attica Bank S.A. is under obligation to collect from and report to the Greek tax authorities certain information of its clients opening accounts with Attica Bank S.A. **as of 1 January 2016 onwards**, as well as of clients holding specific accounts as at 31 December 2015, as a result of Greece becoming a participating country in the System for the Automatic Exchange of Information under the Common Reporting Standard (**CRS**) of OECD.

In particular:

- By virtue of law 4378/2016 (Government Gazette A' 55/106), amending law 4170/2013, Greece implemented Council Directive 2014/107/EU "amending Directive 2011/16/EU as regards mandatory automatic exchange of information in the field of taxation", adopting the use of CRS at European level.
- By virtue of law 4428/2016 (Government Gazette A' 190/2016) Greece ratified its participation in the Multilateral Competent Authority Agreement (MCAA) on Automatic Exchange of Financial Account Information. Today almost 90 countries participate in the Common Reporting Standard through the MCAA, with the number of participating countries increasing. A full list of MCAA participating countries is available on the OECD website (<http://www.oecd.org/tax/automatic-exchange/international-framework-for-the-crs/MCAA-Signatories.pdf>).

Within this framework, the following obligations are imposed on Attica Bank S.A., being a "Reporting Financial Institution":

(a) Collection of particular information of tax nature from its clients (and their controlling persons where applicable), including their name, tax residency and their Tax Identification Numbers. The collection of information concerns:

- Holders of accounts opened as of 1 January 2016 onwards; and
- Particular holders of accounts that already existed on 31 December 2015.

(b) Transmission to the competent Greek tax authorities of above clients' information as well as of information relating to their accounts with Attica Bank S.A., including balance, interests, dividends etc.

Information under (a) will be collected through Attica Bank S.A. clients (and their controlling persons where applicable) filling-in and returning to Attica Bank S.A. the appropriate self-certification forms (depending on the type of client: individual / legal entity; and depending on type of legal entity, the self-certification form of its controlling person), or otherwise through information available to Attica Bank S.A..

Please note that these forms do not substitute or replace other similar forms that may be required to be completed by you for FATCA purposes.

With respect to any personal data included in above information, Attica Bank S.A., as data controller, notifies the following:

- Processing of personal data: Collection, transmission and any other processing of personal data for the purposes of laws 4378/2016 and 4428/2016 (i.e. for CRS reporting purposes) takes place in accordance with law 2472/1997 on data protection, as amended and in force. Such personal data include name, tax residency, Tax Identification Number and accounts related financial information (including balance, interests and dividends).

- Recipients: Such personal data are transmitted by Attica Bank S.A. to the competent Greek tax authorities, in fulfillment of its obligations under law. The competent Greek tax authorities, in their capacity as data controllers, have undertaken to exchange such information on an annual basis, **commencing as of September 2017** (relating to information of tax year 2016) with the competent tax authorities of other countries participating in the Automatic Exchange of Information System and in particular:
 - EU member states;
 - Countries that participate in the MCAA;
 - Countries with which Greece has executed bilateral agreements; and
 - Countries with which the European Union has concluded relevant agreements.
- Data subjects rights: With respect to such processing, data subjects have access and objection rights in accordance with law 2472/1997 on data protection, as in force. For the exercise of such rights, data subjects may refer to Attica Bank S.A. (tel.no +30210 3669000, email: Compliance@atticabank.gr , address: Attica Bank S.A., Omirou str., 23, 10672 Athens, Greece).

Important note:

Attica Bank S.A. does not provide advice to its clients relating to their tax residency nor advice of tax or legal nature. Clients may have to seek advice from their tax or legal advisor.