

DATA PROTECTION INFORMATION NOTICE

1. INTRODUCTION

National Bank of Greece (Cyprus) Ltd (hereinafter referred to as 'NBG Cyprus', 'the Bank', 'we', 'our', or 'us') recognises the significance and is fully committed to the task of protecting your privacy and safeguarding your personal data.

This Notice provides an overview of how the Bank processes your personal data and your rights under the applicable regulatory framework, and, in particular, under the General Data Protection Regulation (GDPR), 2016/679, of the European Union. The aim of GDPR is to protect and enhance the rights and freedoms of EU citizens in relation to personal data protection and privacy.

This Notice is directed to **natural persons** who are:

- current, potential or past customers of the Bank
- beneficial owners or authorised representatives/agents of legal entities which are current, potential or past customers of the Bank
- authorised representatives/agents of natural persons who are current, potential or past customers of the Bank

2. WHO WE ARE

NBG Cyprus (Reg. No: HE 58070) is a licensed by the Central Bank of Cyprus credit institution having its registered address at 15 Arch. Makarios III Avenue, Nicosia 1065, Cyprus. The Bank offers a broad range of financial solutions to businesses, individuals and other institutional clients. NBG Cyprus is a member of the National Bank of Greece Group, one of the largest and strongest financial groups in Greece.

3. PERSONAL DATA

Personal Data under the GDPR is defined as any information relating to an identified or identifiable **natural person** who, in turn, is defined as one who can be distinguished by reference to an identifier such as a name, an identification number, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

4. OBLIGATION TO PROVIDE DATA

The Bank is a regulated financial institution and, as such, it has a duty to obtain and possibly process certain personal data from its customers (including all the natural persons as defined in section 1 above). For example, under the relevant anti-money laundering law the Bank is obliged obtain and verify your identity and your residential address before it enters into a business relationship with you while under the relevant Central Bank's Credit Granting Directives, the Bank is obliged obtain and possibly process certain data relating to your financial status before granting a credit facility to you. *Therefore, if you fail to provide us with the required data, then we will not be able to commence or continue a business relationship with you.*

You are responsible for providing us with accurate and up to date information, and you must inform us of any changes as soon as possible. If you provide information for another person (for example, a joint account holder or a beneficiary of a legal entity you represent) then you have to direct them to this notice.

5. PERSONAL DATA COLLECTED AND PROCESSED BY THE BANK

Depending on the context and purpose(s) of processing, we may lawfully obtain different types of personal data directly from our current or potential customers (directly from you or from your representative/agent). We may also lawfully obtain or otherwise process your personal data even if you are not a customer, such as in cases where you are a counterparty in a transaction (e.g. over-the-counter transactions) or a guarantor/security provider. The personal data which the Bank may obtain or otherwise process is shown on the table below:

Type of customer / relationship	Personal data which the Bank <u>may</u> obtain or otherwise process
<ul style="list-style-type: none"> • Potential customers • Beneficial owners or authorised representatives/agents of legal entities who are potential customers • Authorised representatives/agents of natural persons who are potential customers • Non-customer • Potential security providers 	<ul style="list-style-type: none"> ✓ Name/Surname ✓ ID/Passport number ✓ Date and place of birth ✓ Nationality ✓ Residential address ✓ Contact details (phone number & email address) ✓ Source of income ✓ Value and source of wealth (including supporting documentation) ✓ Occupation and employment status ✓ Tax residence and tax ID ✓ FATCA and CRS status ✓ Marital status ✓ Politically Exposed Person (PEP) status ✓ Authentication data (signature)
<ul style="list-style-type: none"> • Current customers • Beneficial owners or authorised representatives/agents of legal entities which are current customers • Authorised representatives/agents of natural persons who are current customers • Security providers 	<p><u>Additional personal data:</u></p> <ul style="list-style-type: none"> ✓ Income and expenses ✓ Employment history ✓ Information on your economic and financial background ✓ Number of dependent persons (including underage children) ✓ Current debts (including debit/credit cards details) and amount and frequency of instalments ✓ Property documentation (including property valuation reports, construction and municipal permits, sale or purchase agreement, cost estimation) ✓ Information on requested transactions (including supporting documentation such as signed contracts or invoices) ✓ Other banking relationships ✓ Personal investments ✓ Life insurances

We may also collect and process personal data which we lawfully obtain from trusted third parties such as credit reference agencies (Artemis Bank Information Systems Ltd), companies/individuals approved by the Bank that introduce customers to us (this mainly applies

to international customers), public authorities and companies that process cards payments (such as JCC Payment Systems Ltd).

In addition, we may collect and process personal data which we lawfully obtain from publicly available sources such as the internet, the media, the press, the Department of Registrar of Companies and Official Receiver, the Land Registry and the Bankruptcy Archive.

The Bank collects personal data in relation to persons under 18 years of age only with their parents' or legal guardian's consent or when this is permitted by the law.

6. SENSITIVE PERSONAL DATA

The GDPR treats some types of sensitive personal information as special ones. Sensitive personal data includes information about racial or ethnic origin, trade union membership, health data, and criminal records. We will not collect or use these types of data without your explicit consent unless we are lawfully allowed to do so. If we collect such data, it will only be when it is necessary (a) for reasons of substantial public interest, or (b) to establish, exercise or defend legal claims.

7. PROCESSING OF YOUR PERSONAL DATA

We will only process the minimum amount of personal data to fulfil our specified purposes, and only do so if the processing is performed on the basis of at least one of the following reasons, as prescribed by GDPR:

- ✓ A contract between you and the Bank: you may need to provide personal data which concerns you, and we may otherwise process such data, before you enter into a contract with the Bank and/or for the performance of such a contract. Therefore, in order to provide to you our products and services (e.g. current accounts and overdrafts, credit/debit cards, loans etc.), we need to obtain, or otherwise process, certain personal data which concerns you.
- ✓ A legal obligation we must comply with: as a regulated banking institution, we are subject to various local and EU laws and regulations and Central Bank of Cyprus Directives ('regulatory framework') which explicitly require the collection or otherwise processing of personal data for identification purposes (Know-Your-Client), Anti-Money Laundering and Counter Terrorism Financing (AML/CTF) purposes, creditworthiness assessment and for other compliance purposes.
- ✓ A legitimate interest: we may collect, or otherwise process, personal data which concerns you in order to protect the legitimate interests of the Bank or a third party, provided that these legitimate interests do not threaten your rights and freedoms. Examples include the recording and monitoring of your telephone conversations with the Bank for customer service improvement and investigation purposes, and the video surveillance (CCTV) monitoring at the ATM points and other premises of the Bank for crime and fraud prevention purposes. It is noted that the Bank will inform you when your conversation will be recorded or when there is a CCTV monitoring in place.
- ✓ Your consent: we may lawfully process your personal data if you provide us your express consent for processing (other than for the reasons listed above). In such a case, you can, at any time, withdraw this consent and thereby terminate the associated processing of your personal data. We currently obtain your consent for direct marketing purposes in order to promote and keep you up to date with our latest products and services. It is noted, however, that any processing of personal data that took place prior to the withdrawal of your consent will not be affected.

8. THIRD PARTIES THAT WE MAY REPORT TO OR SHARE WITH PERSONAL DATA

We will share personal data which concerns you to third parties only when we are permitted or required by the applicable regulatory framework. In case where third parties (service providers and suppliers) are appointed by the Bank to process your personal data, these third parties will be contractually obligated to comply with the data protection principles mandated by the GDPR. Personal data which concerns you may be reported to or shared with, for example:

- The supervisory or regulatory authorities such as the Central Bank of Cyprus
- Law enforcement agencies such as the Cyprus Police, the Unit for Combating Money Laundering (MOKAS) and other criminal prosecution authorities
- Public authorities such as the income tax authorities
- Credit reference agencies such as Artemis Bank Information Systems Ltd
- Credit and financial institutions such as our correspondent banks
- Valuators and surveyors
- Auditors
- Credit card providers like Mastercard
- Card payment processing companies such as JCC Payment Systems Ltd
- External legal advisors
- File storage and records management companies
- Collection Agencies
- The National Bank of Greece S.A. (for reporting and regulatory purposes)

9. TRANSFER OF PERSONAL DATA TO A THRID COUNTRY

We generally do not transfer your personal data outside the European Union (EU) or the European Economic Area (EEA) unless we have a legitimate reason to do so, such as, for the execution of your payment or investment order (e.g. to correspondent banks) or when it is required by the applicable regulatory framework (e.g. reporting regulations under Tax Laws) or when you have provided your explicit consent to do so.

In case where we transfer your personal data outside the EU or the EEA, we ensure that the organisation receiving the data provides the required level of protection in accordance with the principles of the GDPR.

10. AUTOMATED DECISION-MAKING AND PROFILING

We generally do not reach decisions about you via automated means but we may, at times, process personal data which concerns you automatically in order to evaluate certain personal aspects about you (profiling). In particular, we are required by the relevant anti-money laundering law to monitor transactions and, as such, we process your data automatically and apply profiling to detect and prevent illicit activities. These measures also serve to protect you in case of fraud. It is clarified that we do not use profiling for marketing purposes.

11. RECORD KEEPING

Once we establish a business relationship with you, we will process your personal data for the duration of this relationship and for a further period of up to ten (10) years following its termination, unless we have a legitimate reason (legal or regulatory) to retain the data even further (such as in case of a legal action) or your data cannot be deleted/destroyed for technical reasons.

In case we reject your application as a potential customer and we are unable to provide you with our products and services, then the personal data you provided to the Bank will be processed/retained for -a period of up to six (6) months, unless we have a legitimate reason (legal or regulatory) to retain the data even further.

12. YOUR RIGHTS AND HOW YOU CAN EXERCISE THEM

The GDPR provides you, under certain terms and conditions, with the following rights:

- ✓ Right of access: you can obtain confirmation of whether your personal data is being processed by the Bank and request a copy of this data as well as all the available information concerning its processing.
- ✓ Right to rectification: you can rectify personal data which concerns you and is inaccurate or incomplete.
- ✓ Right to be forgotten: you can request us to erase your personal data, provided that certain conditions are satisfied.
- ✓ Right to restriction of processing: you can request the restriction of the processing of your personal data, provided that certain conditions are satisfied.
- ✓ Right to data portability: you can receive all your personal data and transmit them to another financial institution without hindrance from NBG Cyprus, provided that certain conditions are satisfied.
- ✓ Right to object: you can object and thereby terminate the processing of your personal data, provided that certain conditions are satisfied.
- ✓ Rights related to automated decision-making, including profiling: you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or affects you in a similar manner, provided that certain conditions are satisfied.
- ✓ Right to withdraw consent: in cases where you provide your consent for the processing of your personal data, you can, at any time, withdraw this consent and thereby terminate any associated processing.
- ✓ Right to launch a complaint: If, for any reason, you are not satisfied with the way we handle your personal data or address the above data protection rights, you have the right to complain by completing our on line complaints form (<https://www.nbg.com.cy/en/communication/customer-complaints/>). You can also make a formal complaint to the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus (www.dataprotection.gov.cy).

For more information on how to exercise the above rights and the terms and conditions which they are governed by or for more information on personal data protection, please visit one of the Bank's branches, contact us via our website (www.nbg.com.cy) or contact our Data Protection Officer (DPO) directly by:

Post:	National Bank of Greece (Cyprus) 15 Arch. Makarios III Avenue Nicosia, 1065 Cyprus
Telephone:	+ 357 22 840000
Fax:	+ 357 22 840010
Email:	dataprivacy@nbg.com.cy

13. HOW DO WE PROTECT YOUR PERSONAL DATA

NBG Cyprus employs physical, technical, and organisational security measures to ensure the protection of your personal data while at rest, in use, or in transit, against accidental or intentional modification, disclosure, destruction, loss, misuse, or access by unauthorised individuals.

NBG Cyprus ensures that the confidentiality of the personal data collected, or otherwise processed, is treated with the utmost discretion. The Bank implements the 'least privilege' principle to limit access to personal data and the 'need to know' principle to grant such access only when it is required for legitimate purposes.

14. OUR WEBSITE PRIVACY POLICY

You can find out how we process personal data via our website by visiting the following link: <https://www.nbg.com.cy/en/webpage-privacy-policy/>

15. AMENDMENTS TO THE BANK'S DATA PROTECTION INFORMATION NOTICE

The Bank will properly notify you when this Notice has been amended.

Data Subject Signature:

Date: