



FAQ regarding Data Update -

Natural Persons

1. Question: The Bank contacted me and request to "update" the information it already holds about me. What is "updating"?

Answer: The Bank is obliged, in accordance with the provisions of the relevant regulatory framework (please see below), to keep a record and ensure that the data held in relation to you are fully updated, in order to confirm the validity and adequacy of the data it holds about you throughout the duration of our business relationship between us.

To this end, the Bank examines and checks at regular intervals the validity and adequacy of the identification data and elements that compose your financial profile.

Accordingly, it contacts you in order to confirm the existing data or obtain new ones where necessary.

This process is called ("**update**").

Note that it is also your obligation, in case of a change in your data, to immediately inform the Bank to this effect.

Please note the relevant regulatory framework for your information:

- Law on The Prevention and Suppression of Money Laundering of 2007 (188(I)/2007) ("**the Law**") – Articles 60(d) and 62(6).
- Directive of the Central Bank of Cyprus on the Prevention of Money Laundering and Terrorist Financing ("**CBC Directive**") – (para. 82-86).
- General Data Protection Regulation (2016/679) ("**GDPR**") – Article **5(1)(d)**.

2. Question: What are the usual data (documents and information) that may be requested when updating customer details?

Answer: The documents that may be requested for the update of Natural Persons' data, include, indicatively, the following:

Identity verification documents (that are valid):

- Identity card
- Passport (or equivalent document)
- Alien Registration Card (ARC)

Proof of permanent address/residence (not older than 6 months) for example:

- Recent utility bill and/or
- Document of home insurance, and/or municipal taxes and/or bank account statement and/or



ΕΘΝΙΚΗ ΤΡΑΠΕΖΑ ΤΗΣ ΕΛΛΑΔΟΣ (ΚΥΠΡΟΥ) NATIONAL BANK OF GREECE (CYPRUS)

- Rental contract for residential or business premises

Contact details:

- Phone number (preferably mobile)
- Email address
- Posting address (if different from permanent home address)

Proof of source and amount of annual income and wealth:

- Occupation (details of professional and other activities, including name of employer/company, position in the company) and current business address
- Expected annual income
- Expected sources of funds to be credited to the account(s)
- Expected destination of funds from account(s)
- Expected account credit activity
- Information about the purpose and reason for using accounts and services
- Data relating to transactions, especially if they are not consistent with the customer's financial profile or go beyond the usual account activity
- Data concerning the tax status of the customer
- Any other information deemed necessary depending also on the calculated risk*

Customer specimen signature

The supporting documents to be submitted should be original and, where necessary, duly certified.

The Bank may request you to fill in the above information in a Bank form designed for this purpose entitled "Customer Information Update Form for Natural Persons/ Financial Profile".

For some categories of natural persons (e.g. applicants for international protection, political refugees, victims of trafficking and/or exploitation of persons) there may be a difference in the above data and documents.

**According to paragraph:*

- *36 of the CBC Directive on the Prevention of Money Laundering and Terrorist Financing, the Bank may establish its own Policies, Procedures and Controls, as appropriate.*
- *50 of the CBC Directive, the Bank is required to take appropriate measures to reduce the risk it identifies on a case-by-case basis.*

3. Question: What are the possible consequences if I fail to provide all the necessary information to the Bank?

Answer: In accordance with article **62(4)** of the Law as well as paragraphs 86, 100 and 271 of the CBC Directive, in case you omit or refuse to provide the Bank with the required data and information to update your identification details and financial profile within the deadline* given by the Bank, the Bank may no longer allow the execution of



your transactions, and/or terminate the relevant agreement(s) governing the business relationship between us and close the respective Account(s), with a possible submission of a report to the Unit for Combating Money Laundering (MOKAS).

** Please note that you will be given a reasonable period of time for compliance*

4. Question: In what manner and how often does the Bank contact you to request information for update purposes?

Answer: The Bank may contact you to update your details in one and/or more of the following ways

- By phone (your calls may be recorded)
- Via video conference - Teams (video conference may be recorded)
- By email
- By letter which you will receive via regular or registered mail

In addition, the update may also be conducted in person during your visit to the service branch.

The frequency of updating your data is determined by the Bank's policies and procedures, as set out in full compliance with the relevant regulatory framework and may be carried out even on an annual basis (based on the customer's risk category) or earlier if we become aware that we do not possess valid or sufficient data.

Special attention must be paid to following; regardless of how the Bank may contact you, you will never and under no circumstances be asked to disclose your personal access code/ passwords for Bank systems/online services, or credit and/or debit card details. In case you have any doubt whether your communication is with the Bank, you can request that the update of your details be carried out by physical presence at your service branch.

5. Question: How is the management of the data/information you have provided to the Bank handled?

Answer: The Bank complies with the provisions of the Business Credit Institutions Law (L.66(I)/1997), article **29** which governs the observance of banking secrecy, while the provisions of the Law on the Protection of Natural Persons with regard to the Processing of Personal Data and on the Free Movement of Such Data of 2018 (L.125(I)/2018) and the General Data Protection Regulation 2016/679 are observed. For more information you can refer to the Bank's Privacy Statement which has been provided to you and which is also available at the Bank's branches and posted on the Bank's website <https://www.nbg.com.cy>.