

# INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA IN THE CONTEXT OF EXPRESSING INTEREST IN THE “GENERATION FORWARD” INITIATIVE OF EUROBANK GROUP PRIVATE BANKING

We hereby provide you — the individuals who have expressed interest in the “Generation Forward” initiative of Eurobank Group Private Banking (hereinafter the “**Initiative**”) — following the submission of the relevant online form, and in your capacity as eligible participants in the Initiative i.e. individuals aged 20 to 40 who are either clients of Eurobank Private Bank Luxembourg S.A. (hereinafter “**Eurobank**”) or descendants (children) of clients of Eurobank, within the framework of which (Initiative) access is provided to services, events/activities, networking opportunities with other eligible participants and other benefits (collectively referred to as “**the Benefits and Activities of the Initiative**”), which are provided by Eurobank and/or third-party companies cooperating with Eurobank — the following information concerning the processing of your personal data pursuant to Regulation (EU) 2016/679 (hereinafter the “**GDPR**”), Law 4624/2019 and all other applicable Luxembourg and EU legislation on the protection of personal data.

## **1. Data Controller**

The Data Controller is Eurobank Private Bank Luxembourg S.A., with registered office in Luxembourg, 534 rue de Neudorf, registered with the Luxembourg Trade and Companies Register Number B24724 (hereinafter the “**Data Controller**”)

## **2. Which of your personal data are collected and processed by the Data Controller, from which sources, for what purposes and on which legal basis?**

The personal data collected and processed by the Data Controller are indicatively the following and may not all concern you: identification and contact data which you declare when submitting the online form for the Initiative [specifically your full name, date of birth, father’s full name, mother’s full name, place of residence, mobile phone number and email address, your status as an existing Private Banking client of Eurobank or as a descendant (child) of a Private Banking client of Eurobank, as applicable], as well as any data arising from your participation in the Initiative [namely data submitted by you to the Data Controller or arising in connection with your participation in the Initiative during its implementation (including data processed by third-party partners cooperating with the Data Controller in the context of the Initiative), especially during your use/participation in the Benefits and Activities of the Initiative, as well as any communications with the Data Controller, its officers, etc.], for the purpose of admitting you to the Initiative, communicating with you to inform you about the Benefits and Activities of the Initiative (including, indicatively, by sending relevant informational/promotional material concerning the Benefits and Activities of the Initiative and/or by calling you at the contact details you provided in the online form) and for the general organisation and implementation of the Initiative.

The legal basis of this processing is your consent (**Article 6 (1)(a) GDPR**), which is inferred from your positive action of completing the online form and opting to receive updates regarding the Benefits and Activities of the Initiative, as available on Eurobank's website.

You may withdraw your consent at any time by sending an email to [PrivateBanking@eurobankpb.lu](mailto:PrivateBanking@eurobankpb.lu), requesting the withdrawal of your consent.

Upon completion of the registration of your data as described above, you will receive an email from the Data Controller at the email address you submitted, confirming your registration in the Initiative for the purpose of receiving updates regarding the Benefits and Activities thereof. You must ensure that the personal data you provide in the relevant online form belong to you (and not to a third person), are correct and accurate, and you undertake to notify the Data Controller as soon as possible of any change or modification.

Finally, the aforementioned personal data may also be processed for the following purposes: **(i)** compliance of the Data Controller with obligations imposed by applicable legal, regulatory and supervisory frameworks, as well as decisions/requests of any authorities (public/administrative, supervisory, independent, prosecutorial etc.) or courts (regular or arbitral) [the legal basis for this processing is compliance with a legal obligation of the Data Controller, pursuant to Article **6 (1)(c) GDPR**]; and **(ii)** the protection and defence of the rights and interests of the Data Controller and/or third parties [the legal basis for this processing is the pursuit of the legitimate interests of the Data Controller and/or third parties, provided that your own interests or fundamental rights and freedoms do not override them, pursuant to Article **6(1)(f) GDPR**].

### **3. Who are the recipients of your data?**

Recipients of your data may indicatively be: **i)** the authorised employees and members of the Data Controller's administration acting within the scope of their duties on a need-to-know basis, **ii)** companies/entities cooperating with the Data Controller within the Initiative for the provision/implementation of the Benefits and Activities of the Initiative, such as, indicatively, event-management, public-relations, communications and advertising companies, companies providing advisory, investment, tax or other services, as well as their employees, **iii)** providers of IT products or services or support for any type of information and electronic systems and networks, including online systems and platforms, providers of electronic communications and information-society services (indicatively telecommunications providers, email services, hosting services, messaging applications), and postal service providers, **iv)** lawyers, law firms, bailiffs, experts, consultants and providers of advisory services within the scope of their responsibilities; **v)** supervisory, independent, judicial, prosecutorial, public/administrative and other authorities or bodies or entities entrusted with auditing/monitoring the activities of the Data Controller, as well as accredited mediators, mediation service centers, arbitral tribunals and alternative-dispute-resolution bodies.

### **4. In which cases may the Data Controller transfer your data to third countries (outside the EEA)?**

The Data Controller may transfer your personal data to third countries or international organisations outside the European Economic Area (EEA), provided that:

- a. An adequate level of protection is ensured by the third country, territory or one or more specified sectors within that third country, or the international organization pursuant to the European Commission's relevant decision; or
- b. Appropriate safeguards for the processing of personal data have been provided pursuant to the legislation (usually by signing standard contractual clauses issued by the European Commission). A copy of these safeguards can be obtained by filing a relevant request at: [PrivateBanking@eurobankpb.lu](mailto:PrivateBanking@eurobankpb.lu).

## **5. For how long will the Data Controller retain your data?**

Your personal data shall be retained for the period necessary to fulfil the purposes for which they were collected and processed, or for the period required by the applicable legal and/or regulatory framework, or for the establishment, exercise or defence of legal claims or the protection of rights and legitimate interests, taking into account, *inter alia*, the nature, sensitivity and volume of the data, the potential risk of harm from a breach, the purposes of processing and whether these purposes can be achieved by other means.

Specifically, your data will be retained from the date of their submission/collection, as mentioned above under section 2, and for as long as the Initiative is implemented, unless the legal/regulatory framework, the exercise of claims, the defence of rights and legitimate interests, or record-keeping requirements necessitate their further retention. If you withdraw your consent, your data will be securely deleted by the Data Controller, provided there is no other purpose justifying continued retention as outlined above.

## **6. What are your rights regarding your personal data?**

You have the following rights to the extent permitted by the applicable legislation:

- a. To request information regarding the categories of your personal data that we process and retain, their origin, the purposes of their processing, the categories of their recipients, the retention period and your related rights (right of access)
- b. To request the correction and/or completion of your personal data so that they are complete and accurate, providing all necessary documentation demonstrating the need for correction or completion (right to rectification).
- c. To request restriction of the processing of your data (right to restriction).
- d. To object to any further processing of your personal data (right to object).
- e. To request the erasure of your personal data under certain circumstances, such as in case the data are no longer necessary, the data have been unlawfully processed etc. (right to erasure).

- f. To request the transfer of your data kept by Data Controller to any other controller (right to data portability).
- g. To withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal and re-granting of withdrawn consent is permissible.
- h. You may lodge a complaint with the Luxembourg National Commission of Data Protection [Commission nationale pour la protection des données (“CNPD”)] (<https://cnpd.public.lu/en.html>) if you believe that your rights are being infringed in any way. For information regarding the Authority’s competence and the procedure for submitting a complaint, you may visit its website (<https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html> – Submitting a complaint to the Authority), where detailed information is available. Please note the following regarding the above rights:
  - i. Rights (c), (d) and (e) may not be satisfied, in whole or in part, if they concern data necessary for the purposes for which they were collected.
  - ii. The Data Controller may refuse your request for restriction or deletion if processing or retention is necessary for the establishment, exercise or defence of legal claims or for the fulfilment of obligations.
  - iii. Exercising the right to data portability does not entail deletion of your data from the Data Controller’s records; deletion is subject to the conditions of the previous paragraph and applicable legislation.
  - iv. Exercising the above rights operates for the future and does not affect processing already carried out.

## **7. How can you exercise your rights?**

To exercise your rights, including withdrawal of consent, you may contact us via email at [PrivateBanking@eurobankpb.lu](mailto:PrivateBanking@eurobankpb.lu). For the efficient examination and handling of your requests, please specify which right(s) you are exercising. The Data Controller will make every effort to respond within one (1) month of receipt. This period may be extended by two (2) further months, if necessary at the absolute discretion of the Data Controller, taking into account the complexity and number of requests. You will be informed of any extension within one (1) month of receipt of your request. Any information, communication or actions taken to handle your rights requests are provided free of charge; however, if your requests are manifestly unfounded, excessive or repetitive, the Data Controller may charge a reasonable fee or refuse to act on the request(s).

## **8. Data Protection Officer**

You may contact the Data Protection Officer (DPO) of the Data Controller regarding matters related to the processing of your personal data at: 534, rue de Neudorf, L-2220 Luxembourg, or via email at [info@eurobankpb.lu](mailto:info@eurobankpb.lu) or using the contact details provided under section ‘Contact Us’ on Eurobank’s website (<https://www.eurobankpb.lu/Contact>).

It is expressly clarified that this notice is specific and is further supplemented, in the event of a transactional relationship, by the “Information Notice on the processing of personal data by Eurobank Private Bank Luxembourg S.A. in accordance with Regulation (EU) 2016/679 and the applicable Luxembourg and EU legislation”, which is published on Eurobank’s website at <https://www.eurobankpb.lu/en/Pages/Privacy-Notice>.