

## EUROBANK GROUP

### **EUROBANK ERGASIAS S.A. GROUP COMPANIES BOARD OF DIRECTORS MEMBERS' AND OTHER PERSONS' INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO THE REGULATION (EU) 2016/679 AND THE RELEVANT EU AND GREEK LEGISLATION**

This Information aims at analyzing how your personal data are being processed by the Eurobank Ergasias S.A. Group companies, in their capacity as Controllers, the names and contact details of which are provided below in Section 7 (hereinafter referred to as "Group Companies" or "Group"), taking into consideration the Regulation (EU) 2016/679 and the provisions of the relevant Greek and EU legislation on personal data protection. The term "you" refers for the purposes of this Information to members or candidate members of the Board of Directors of the Group Companies (hereinafter referred to as the "BoD") as well as their spouses/partners and up to second-degree relatives or any dependents.

#### **1. What personal data may the Group Companies collect and process and from which source?**

The personal data that may be collected and processed by the Group Companies fall primarily within the following categories; it is explicitly clarified that some of the categories may not concern you:

##### **1.A.** For members or candidate members of the Board of Directors of the Group Companies:

- a) Identification data: name, father's name, mother's name, Identity Card number/Passport number, Tax Identification Number, date of birth, etc..
- b) Contact information: postal and e-mail address, landline and mobile telephone numbers, etc..
- c) Family status and dependent family members' data.
- d) Profession and professional skills data such as indicatively CV, education certificates, professional certificates, professional licenses, etc..
- e) Data deriving from your employment in/cooperation with/client relationship with a Group Company/Companies.
- f) Family relationships (up to sixth-degree, spouses/partners/ex-spouses/fiancés, godparenthood) with Group employees.
- g) Criminal record data.
- h) Data concerning your financial situation (certificate of non-bankruptcy declaration, certificate of non-payments cessation etc.).
- i) Professional activity data (participation in Boards of Directors/Committees/legal entities outside the Group).
- j) Other data deriving from documents in general and supporting documentation you may provide us with, from several questionnaires you may fill during your relationship as BoD member or during your evaluation as candidate BoD member.
- k) Data deriving from your relationship as BoD member, such as indicatively communication, correspondence etc..

The aforementioned data are collected either directly from you or from third persons acting on your behalf (i.e. proxies, representatives etc.) or from the Group Companies. Moreover, in case you provide

us with personal data of third persons you must have in advance properly informed them by referring them to this Data Protection Information and have ensured their consent, where necessary.

**1.B.** For the spouses/partners, up to second-degree relatives or any dependents of the members or candidate members of the Board of Directors of the Group Companies:

- a) Identification data: name, father's name, mother's name, Identity Card number/Passport number, Tax Identification Number, date of birth.
- b) Contact information: postal address.
- c) Family status and dependent family members' data.
- d) Data deriving from your employment in/cooperation with/client relationship with a Group Company/Companies.
- e) Professional activity data (participation in Boards of Directors/Committees/legal entities outside the Group).

The aforementioned data are collected from the members or candidate members of a Group Company BoD under the abovementioned conditions or by third parties acting on their or on your behalf (i.e. proxies, representatives etc.).

## **2. Why do the Group Companies collect your data and for which purposes they process them?**

The Group Companies process your personal data:

- a) in order to comply with their legal obligations,
- b) for purposes regarding their or third parties' overriding legal interests (in case the Group Companies' interests override your interests or fundamental rights and freedoms imposing the protection of your data),
- c) for serving your relationship as BoD member, or  
upon your consent, provided the processing cannot be established in any of the aforementioned 2a-2c legal bases for the following purposes (some of the processing purposes mentioned below may not concern you):
  - a) Your identification.
  - b) The communication with you.
  - c) The Group Companies' compliance with the legal and regulatory framework as each time in force
  - d) The evaluation of your candidacy for your nomination as BoD member.
  - e) The determination and/or evaluation of your responsibilities, tasks and duties as BoD member.
  - f) The fulfilment of the Group Companies' obligations towards you (i.e. payment of compensation).

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

Your personal data are accessible by the Group Companies' management and/or their authorized employees, when required for the satisfaction of the purposes described in Section 2 of this Information.

The transfer of personal data to recipients outside the Group Companies may take place only in the following cases:

- (a) In case the transfer is considered absolutely necessary for serving your relationship as BoD member; or
- (b) For the Group Companies' compliance with their legal obligations; or
- (c) For the Group Companies' or third parties' overriding legitimate interests; or

(d) Upon your consent.

In such case, recipients of your personal data may indicatively be:

1. Entities and persons providing accounting and payroll services, services regarding data and records storage, filing, management and destruction, entities providing counselling and/or audit services, lawyers, law firms, as well as other entities that process data within the framework of fulfilling the purposes mentioned above herein under Section 2.
2. Supervisory, audit, independent, judicial, prosecution, public and/or other authorities or entities within their competences, duties and powers (e.g. European Central Bank, Bank of Greece, General Commercial Registry).

#### **4. Are the Group Companies entitled to transfer your data to third countries (outside European Economic Area [E.E.A.]?)**

The Group Companies may transfer your personal data to third countries (outside the E.E.A.) under the following circumstances:

- 1) if the European Commission decides that the third country, a territory or one or more specified sectors within that third country ensure an adequate level of protection; or
- 2) if appropriate safeguards for the data processing have been provided from the recipient, according to the EU and/or national legislation.

In the absence of the abovementioned circumstances a transfer may take place in case of derogation for a specific situation as foreseen by the EU and/or national legislation. Some of these derogations may indicatively be the following:

- 1) you have explicitly consented to the transfer; or
- 2) the transfer is necessary for the establishment or exercise of legal claims or the defense of the rights of the Group Companies; or
- 3) the Group Companies are obliged by law or an international convention to provide the data; or
- 4) the Group Companies are obliged to comply with regulations regarding the automatic exchange of data within the tax sector, as derived from Greece's international obligations.

In order to fulfil the objectives under points 3) or 4) the Group Companies may transfer your data to the competent national authorities so that they in turn deliver the data to the respective authorities of third countries.

#### **5. For how long will the Group Companies store your personal data and for which purposes?**

The personal data of the BoD members as well as those of their spouses/partners, their relatives up to 2<sup>nd</sup> degree or any of their dependents will be stored for as long as the person remains a Group Company BoD member.

In case of termination of the BoD member's tenure for any reason, said member's personal data as well as of those of their spouses/partners, their relatives up to 2<sup>nd</sup> degree or any of their dependents will be stored until the expiration of the limitation period for legal actions, as defined by law, and more precisely for up to twenty (20) years after said person ceases to be a BoD member.

If during the said period of twenty (20) years legal actions are in progress and any of the Group Companies are involved, concerning directly or indirectly the BoD members or their spouses/partners or their relatives or any dependents as described above, the abovementioned storage period will be prolonged until an irreversible judicial decision has been issued.

The BoD candidate members' personal data, in case they are not appointed BoD members in any of the Group Companies, as well as those of their spouses/partners, up to 2<sup>nd</sup> degree relatives or any dependents, will be stored for a period of five (5) years from the rejection of their candidature. If

during said period legal actions are in progress and any of the Group Companies are involved, concerning directly or indirectly the BoD candidate members or their spouses/partners, relatives up to 2<sup>nd</sup> degree and any dependents as referred to above, the abovementioned storage period will be prolonged until an irreversible judicial decision has been issued.

## **6. What are your rights and how can you exercise them?**

You have the following rights to the extent that they can be exercised in each case:

- a) To have access to your personal data processed by the Group Companies (right of access).
- b) To demand the rectification or/and to have your incomplete data completed so that they are accurate (right to rectification) by providing supplementary documents to support the need for rectification.
- c) To ask for a restriction of the processing of your personal data (right to restriction of processing).
- d) To object to any further processing of your stored personal data (right to object).
- e) To ask for the erasure of your personal data from our records (right to erasure).
- f) To withdraw your consent to the processing of your personal data. However, the processing based on your consent prior to your withdrawal remains unaffected.

Please note the following as regards your rights:

- i. The Group Companies have in any case the right to deny your request for restriction of processing or erasure of your data, if their processing or storage is necessary for the establishment, exercise or defense of the Group's rights or the fulfilment of its obligations.
  - ii. The exercise of said rights has future effect and does not affect the processing up to that point.
- g) To lodge a complaint with the Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)) –Citizen's Rights –Complaint to the Hellenic DPA) in case you consider that your rights are in any way violated.

For the exercise of your rights you may contact the Group Company Secretariat (10, Filellinon Street, 10557, Athens, Greece) in writing or by email to [CorporateGovernance@eurobank.gr](mailto:CorporateGovernance@eurobank.gr). The Group Companies shall use its best endeavors to address your request within thirty (30) days of its receipt. Said period may be prolonged for sixty (60) more days, if deemed necessary, taking into account the complexity of the issue and the number of requests. You shall be informed within thirty (30) days after the receipt of your request in any case of prolongation of the abovementioned period. This service is provided free of charge. However, in case the requests manifestly lack of foundation and/or are repeated and/or excessive, a reasonable fee may be imposed after you have been informed or you may not receive an answer to your requests.

## **7. Controller's Identity – Contact details for issues regarding the processing of personal data**

The following Group Companies processes your personal data under their capacity as controllers:

- Eurobank Ergasias S.A., based in 8 Othonos str., 105 57, Athens, Greece, General Commerce Registry (GCR) No 000223001000.
- Eurobank Equities Investment Firm S.A., based in 10 Filellinon str., 105 57, Athens, Greece, General Commerce Registry (GCR) No 003214701000.
- Eurobank Financial Planning Services S.A., based in Kyprou & 27 Archimidous str., 183 46, Moschato, Greece, General Commerce Registry (GCR) No 12160260100.
- Eurobank Asset Management M.F.M.C., based in 10 Stadiou str., 105 64, Athens, Greece, General Commerce Registry (GCR) No 2292401000.
- Eurobank Ergasias Leasing S.A., based in 7-13 Eslin & Amaliados str., 115 23, Athens, Greece, General Commerce Registry (GCR) No 001063001000.
- Be Business Exchanges S.A., based in Al. Panagouli & Siniosoglou str., 142 34, Nea Ionia, Greece, General Commerce Registry (GCR) No 004316901000.
- Eurobank Factors S.A., based in 16 Laodikeias & 1-3 Nymfaiou str., 115 28, Athens, Greece, GCR No 3572901000.
- Eurobank Private Luxembourg S.A. (in country level), based in 5 Rue Jean Monnet L-2180, Luxembourg, Tax Registration No LU13266656.

- Eurobank Bulgaria A.D. (in country level), based in 260 Okolovrasten pat str., District Vitosha, 1766 Sofia, Bulgaria, Tax Registration No BG000694749.
- Eurobank Cyprus Ltd (in country level), based in 41 Arch. Makarios Avenue 1065 Nicosia, Cyprus, Tax Registration No 12217050M.
- Eurobank AD Beograd (in country level), based in 10 Vuka Karadzika str., 11000, Serbia, Tax Registration No 100002532.

For any matter regarding the processing of your personal data you may contact:

- For Eurobank Ergasias S.A. at 6 Siniosoglou str., 142 34, Nea Ionia, Greece (attn. of the responsible for personal data issues) or at [dpo@eurobank.gr](mailto:dpo@eurobank.gr)
- For Eurobank Equities Investment Firm S.A. at 10 Fillelinon & 13 Xenofontos str., 105 57, Athens, Greece (attn. of the responsible for personal data issues) or at [dpo@eurobankequities.gr](mailto:dpo@eurobankequities.gr)
- For Eurobank Financial Planning Services S.A. at 27 Kyprou & Archimidous str., 183 46, Moschato, Greece (attn. of the responsible for personal data issues) or at [dpo@eurobank-fps.gr](mailto:dpo@eurobank-fps.gr)
- For Eurobank Asset Management M.F.M.C. at 10 Stadiou str., 105 64, Athens, Greece (attn. of the responsible for personal data issues) or at [dpo-am@eurobank.gr](mailto:dpo-am@eurobank.gr)
- For Eurobank Ergasias Leasing S.A. at 7-13 Eslin & Amaliados str., 115 23, Athens, Greece (attn. of the responsible for personal data issues) or at [dpo\\_leasing@eurobnk.gr](mailto:dpo_leasing@eurobnk.gr)
- For Be Business Exchanges S.A. at Al. Panagouli & Siniosoglou str., 142 34, Nea Ionia, Greece (attn. of the responsible for personal data issues) or at [dpo@be24.gr](mailto:dpo@be24.gr)
- For Eurobank Factors S.A. at 16 Laodikeias & 1-3 Nymfaiou str., 115 28, Athens, Greece (attn. of the responsible for personal data issues) or at [dpo@eurobankfactors.gr](mailto:dpo@eurobankfactors.gr)
- For Eurobank Private Luxembourg S.A. (in country level), at 5 Rue Jean Monnet L-2180, Luxembourg (attn. of the responsible for personal data issues) or at the contact details referred at <https://www.eurobankpb.lu/Pages/Personal-Data-Notice>
- For Eurobank Bulgaria A.D. (in country level), at 260 Okolovrasten pat str., District Vitosha, 1766 Sofia, Bulgaria (attn. of the responsible for personal data issues) or at [dpo@postbank.bg](mailto:dpo@postbank.bg)
- For Eurobank Cyprus Ltd (in country level), at 41 Arch. Makarios Avenue 1065 Nicosia, Cyprus (attn. of the responsible for personal data issues) or at [dpo@eurobank.com.cy](mailto:dpo@eurobank.com.cy)
- For Eurobank AD Beograd (in country level), at 10 Vuka Karadzika str., 11000, Serbia, (attn. of the responsible for personal data issues) or at [dpo@eurobank.rs](mailto:dpo@eurobank.rs)

## **8. How does the Eurobank Group protect your personal data?**

The Group takes appropriate organizational and technical measures to ensure the security and confidentiality of your personal data and their processing as well as their protection from accidental or unlawful destruction, loss, alteration, prohibited transmission, dissemination or access and any other form of unlawful processing.

This Information replaces any other previous general information regarding the processing of your personal data.