

Information on the processing of personal data of the Board of Directors' members of the company "Eurobank Ergasias Services and Holdings S.A." pursuant to Regulation (EU) 2016/679 and the relevant Greek and European Union legislation

With the present document we would like to inform you on the processing of your personal data by the company under the name "Eurobank Ergasias Services and Holdings S.A.", having its registered offices in 8 Othonos Str., 105 57, registered at the General Commercial Registry with GCR No 000223001000 (hereinafter referred to as the "**Eurobank Holdings**"), that acts in this particular case as data controller, pursuant to Regulation (EU) 2016/679 (hereinafter referred to as the "**Regulation**"), Law 4624/2019 and further provisions of the relevant Greek and EU legislation on personal data protection. The term "you" for the purposes of this Information refers, indicatively, to Eurobank Holdings' Board of Directors' members or candidate members, as well as third persons related to the above, such as spouses/ partners/ registered partners, relatives of the aforementioned persons or financially dependent persons, persons with close links with them, as they are defined in each case by the relevant legal and regulatory framework, their assistants and third parties' observers, such as observers of the Hellenic Financial Stability Fund (hereinafter referred to as the "FTC") etc. in case their personal data are processed for the purposes described in this Information. Notices that are more specific may supplement this Information.

1. What personal data does Eurobank Holdings collect and from which sources?

The necessary personal data that Eurobank Holdings collects may indicatively be the following and not all of them necessarily concern you.

- a. Identification data: name and surname, father's name, mother's name, Identity Card number/Passport number, Tax Identification Number, date and place of birth, citizenship, gender, photograph, electronic identification data such as user name, signature data etc..
- b. Contact information: postal address/ residence data (permanent as well as current residency and relevant documentation), e-mail address, telephone number (fixed and mobile), etc..
- c. Profession and data regarding your professional skills, such as indicatively CV data, data included in questionnaires you fill in, or data from interviews you participate into, data included in documents you provide Eurobank Holdings with, such as education certificates and licenses, professional certificates, referrals and communication data of the persons you appoint for referrals or for the confirmation of these referrals by third persons, data regarding your participation in unions, as well as data regarding your professional experience and activity (participation in boards of directors/ committees, exercise of managing duties or control to other entities beyond Eurobank Holdings).
- d. Data regarding your family status and data dependents, to the extent they are necessary for the fulfillment of obligations arising from the law, policies etc..
- e. Family relationships (including spouses/ partners/ ex-spouses/ fiancés /god-parenthood) with employees of Eurobank Holdings and/or other companies of its group (hereinafter



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referred to as the "Group"; it is explicitly clarified that the Group includes companies of Eurobank Holdings' subsidiary company "Eurobank S.A.").

- f. Criminal record data, data regarding civil or administrative infringements, disciplinary actions, sanctions from professional unions etc., as provided for by the relevant legal and regulatory framework.
- g. Financial status data as provided for by the legal and regulatory framework and Eurobank Holdings' policies (indicatively income tax declarations, tax returns, certificates of non-bankruptcy, certificates proving that an application for bankruptcy has not been filed, certificates of non-payment cassations, data regarding debts etc.).
- h. Data proving the non-existence of conflict of interest (indicatively data regarding business activity with Eurobank Holdings or/and the Group companies, any disputes with Eurobank Holdings or/and the Group companies, professional or trade or client relationship or financial interest with Eurobank Holdings or/and the Group companies or competitors, consultants, suppliers, services providers of Eurobank Holdings or and Group companies, any substantial financial obligations towards Eurobank Holdings or/and Group companies, personal relationships or financial interests with other members of the Board of Directors and or persons in charge of critical activities of Eurobank Holdings or/and Group companies and with persons that have a special participation, as defined by the relevant legal and regulatory framework in Eurobank Holdings and or the Group companies.
- i. Data arising from the period you have the capacity of the member of Eurobank Holdings' Board of Directors, such as indicatively communication/correspondence with Eurobank Holdings or third parties within the framework of your duties/competences, your position/ capacity/ responsibilities /participation in committees/ mandate/education, data required for payments (such as bank account number), data regarding benefits, expenses, data regarding access to the premises, the records as well as any other Eurobank Holdings' electronic equipment.
- j. Data collected from closed circuit television systems in Eurobank Holdings' premises.
- k. Image data such as indicatively data from Eurobank Holdings' or the Group's events .
- l. Special categories data (indicatively health data) provided the legal conditions have been met.

Eurobank Holdings collects the aforementioned data either directly from you or from third persons acting on your behalf (such as proxies, representatives) or persons related with you or from Eurobank Holdings' records (for example data deriving from your appointment as members of the Board of Directors, communication media, data from information systems, systems recording the access and image data etc.) or from companies providing teleconference services. Moreover, the aforementioned data may be collected or verified by Group companies or third persons providing or confirming your referrals.

According to the Regulation, the personal data must be updated and accurate. Consequently, you are obliged to inform Eurobank Holdings for any change on the aforementioned personal data you have transferred to it.



In case you provide us with personal data of third persons, you must have in advance properly informed them, also by referring them to the present document, and have ensured their consent, where necessary.

2. For which purposes does Eurobank Holdings collect your personal data and under what legal bases does it process them?

Eurobank Holdings processes your personal data required each time. In view of the below mentioned processing purposes, in case you deny to provide the necessary personal data and/or to update your data, Eurobank Holdings will not be able to fulfill its relevant obligations (legal or contractual etc.). Eurobank Holdings processes additionally special categories of personal data as defined in art. 9 of the Regulation according to the provisions of the Regulation and the relevant legislation.

A. To service your relationship as a member of the Board of Directors (article 6 para 1b of the Regulation)

Said processing of the data described under section 1 above serves purposes such as:

- a. Your identification.
- b. The communication with you.
- c. The evaluation of your candidature for your appointment as member of Eurobank Holdings' Board of Directors.
- d. The setting or/and evaluation of your competencies, duties, obligations as members of Eurobank Holdings' Board of Directors.
- e. The exercise of your rights and the fulfillment of your obligations as Board of Directors' members and the exercise of Eurobank Holdings' rights and fulfillment of its obligations (i.e. payments) and provision of benefits.
- f. The transfer of your data to third parties to the extent necessary in the framework of Eurobank Holdings' management and representation and the exercise of your duties as Board of Directors' members in general.
- g. The promotion of Eurobank Holdings' corporate profile.

Said processing (point A. above) serves also Eurobank Holdings' compliance with its legal obligations (point B. below) as well as Eurobank Holdings' or a third party's legal interests (point C. below).

B.To comply with its legal obligations (article 6 para 1c of the Regulation)

The processing of the data described under section 1 above serves purposes such as:

- a) Eurobank Holdings' compliance with obligations imposed by the relevant legal, regulatory, and supervisory framework, international agreements as well as with decisions of authorities (public, supervisory, independent, prosecution etc.) or courts (regular or arbitrary).
- b) The protection of persons and property.

Said processing (point B. above) serves also Eurobank Holdings' or a third party's legal interests (point C. below).

C. To protect Eurobank Holdings' or a third party's (such as indicatively companies of Eurobank Group, cooperating companies etc.) legal interests (article 6 para 1f of the Regulation)

Additionally, the processing of the personal data described under section 1 above serves purposes, such as indicatively the establishment, exercise and defense of legal claims, the compliance with Eurobank Holdings' policies, the compliance with the terms of Eurobank Holdings' contracts with third parties, such as the FTC, the security and safety of Eurobank Holdings' information systems, the facilities and assets of Eurobank Holdings or third parties in general, maintaining Eurobank Holdings' records, Eurobank Holdings' reputation, the deterrence of criminal acts or frauds against Eurobank Holdings or a third party, etc.

D. Upon your consent (article 6 para 1a of the Regulation)

In case we have asked and received your consent, especially when the processing cannot be established on any of the abovementioned (2.A. – 2.C.) legal bases, the processing of your data under section 1 is based on your consent (see indicatively the below mentioned case regarding the data transfer outside the EEA under point 4.c.i.). In such cases, you have the right to withdraw your consent at any time. Please see below under section 7 how you can withdraw your consent; where relevant, we will also inform you on specific ways to withdraw your consent depending on the way you consented. The processing based on your consent prior to its withdrawal remains unaffected.

E. Automated decision-making including profiling

Eurobank Holdings does not carry out solely automated individual decision-making. In case Eurobank Holdings decides in the future to carry out automated individual decision-making, including profiling, that produces legal effects or significantly affects you in a similar way, you will be provided with a specific notice and, where required, you will be asked for your consent.

3. Who are the recipients of your data?

Recipients of your data may indicatively be the following:

- a. Eurobank Holdings' competent employees, members of Eurobank Holdings' administration/ committees within the framework of their duties and the competent employees of its subsidiary company "Eurobank S.A." in the framework of the provision of supporting services to Eurobank Holdings and other Group companies.
- b. Lawyers, law firms, bailiffs, notaries, experts, chartered accountants/auditors, and consulting services providers (such as financial consultants, Board of Directors' evaluating companies etc.).
- c. Companies responsible for storage, filing, management and destruction of files, records and data, information application and services providers, teleconference services providers, telecommunication services providers, cloud services providers, information society services providers and mail services providers.

- d. The General Commercial Registry, a publicly accessible registry, where data such as appointment acts or cease of a member, the representation power are published, as provided for by the legal framework.
- e. Your picture as well as data from your CV as Board of Directors' members are also available on the website of Eurobank Holdings and are accessible to its visitors.
- f. Supervisory, independent, judicial, prosecution, police, tax, public or/and any other authorities (such as the Hellenic Capital Market Commission, the Bank of Greece, the European Central Bank, the FTC etc.), authorized mediators and mediation centers, arbitration tribunals and alternative dispute resolution entities.
- g. The General Meeting of Eurobank Holdings' shareholders.
- h. Third parties, such as indicatively clients or partners or mass media, when it is necessary for communication purposes, the management of relations, the fulfillment of Eurobank Holdings' contractual obligations, the execution of transactions and the promotion of the corporate profile in the framework of the duties you have been assigned with as Board of Directors members.
- i. Cooperating with Eurobank Holdings' companies for the provision of services/ benefits to you as Board of Directors Members (indicatively entities providing educational services/ e-learning services, hotels, travel agencies, airline companies etc.).
- j. Insurance bodies and insurance companies.
- k. Any third persons that submit a request to Eurobank Holdings in order to receive information, pursuant to the law.

For the personal data processing of the abovementioned recipients that act as data controllers, we advise you to consult their personal data notices.

4. Is Eurobank Holdings entitled to transfer your data to third countries (outside the EEA)?

Eurobank Holdings may transfer your personal data to third countries or international organizations outside the European Economic Area (EEA) under the following circumstances:

- a) if the Commission decides that the third country, territory or one or more specified sectors within that third country or an international organization ensures an adequate level of protection; or
- b) if appropriate safeguards for data processing have been provided, according to EU and/or national legislation.
- c) In the absence of the abovementioned circumstances, a transfer may take place if a derogation as provided for in by the relevant EU and/or national legislation is met, including indicatively the following:
 - i. You have explicitly provided your consent to Eurobank Holdings;



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- ii. Within the framework of Eurobank Holdings' compliance with obligations imposed by the legislation or international agreements and to the extent that the transfer is necessary for important reasons of public interest, or
- iii. The transfer is necessary for the establishment, exercise or defense of legal claims.

5. For how long will Eurobank Holdings store your personal data?

Your personal data will be kept for the time necessary for the fulfillment of their processing purpose, otherwise for the time required by relevant the legal and/or regulatory framework or the time necessary for the exercise of claims or defense of rights and legitimate interests.

Additionally, few necessary data of yours as members of the Board of Directors may be part of Eurobank Holdings' records and will be kept during the entire period said record exists.

6. What are your rights with regard to the protection of your personal data?

You have the following rights to the extent they can be implemented:

- a. To demand to know the categories of your personal data that we store and process, where they come from, the purposes of their processing, the categories of their recipients, their storage period as well as your relevant rights (right of access).
- b. To demand the rectification or/and amendment to your data so that they are complete and accurate (right to rectification) by providing any necessary document justifying 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 obtain the erasure of your personal data from the records we keep (right to erasure), under certain circumstances, such as in cases the data are no longer necessary, you have withdrawn your consent or your data have been unlawfully processed etc..
- f. To ask for the transfer of your data kept by Eurobank Holdings to any other controller (right to data portability).
- g. To withdraw your consent at any time. The legality of the processing based on your consent before its withdrawal remains unaffected and you can consent again to the processing.
- h. **Right to complain to the Data Protection Authority:** You have the right to lodge a complaint with the Hellenic Data Protection authority in case you consider that your rights are in any way violated. For the Authority's competence as well as the way to lodge a complaint you can find detailed information on its website (www.dpa.gr – Citizen Rights – Complaint to the Hellenic DPA).

Please note the following as regards your abovementioned rights:

- Eurobank Holdings preserves in any case the right to deny your request for restriction of processing of your data or their deletion, in case their processing or storage is necessary for the exercise of your rights or the fulfillment of Eurobank Holdings' obligations towards you, as well as for the establishment, exercise of defense of Eurobank Holdings' rights or its compliance with its legal obligations .



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- Eurobank Holdings has also the right to deny your request for data erasure to the extent that some of these data are not erased but kept for its records as described under point 2.C. above.
- The exercise of these rights is valid for the future and does not affect any previous data processing.

7. How can you exercise your rights under 6 above?

For the exercise of your rights described in the previous section, explicitly including your right to withdraw any given consent, you may contact in writing the Group Company Secretariat (10 Filellinon str., 10557) or by sending an email to CorporateGovernance@eurobank.gr.

Eurobank Holdings will use its best endeavors to address your request within thirty (30) days of its receipt. The abovementioned period may be prolonged for sixty (60) more days, if deemed necessary, at Eurobank Holdings' absolute discretion taking into consideration the complexity of the issue and the number of the requests. Eurobank Holdings shall inform you within thirty (30) days of the request's receipt in any case of prolongation of the abovementioned period. The abovementioned service is provided by Eurobank Holdings free of charge. However, in case the requests manifestly lack of foundation and/or are excessive and repeated, Eurobank Holdings may, after informing you, impose a reasonable fee or refuse to address your request(s).

8. Data Protection Officer

You may contact the Data Protection Officer for any matter regarding the processing of your personal data at the address 8 Othonos Str., 10557 Athens or by sending an email to dpo@eurobankholdings.gr.

9. How does Eurobank Holdings protect your personal data?

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

10. Amendments of this Information

Eurobank Holdings may amend the present Information. In such case, the date of the update will be mentioned at the end of the Information and you will be notified accordingly via a posting on its website www.eurobankholdings.gr.

The present Information was amended on March 20, 2020 and is available online and updated at Eurobank Holdings' website (www.eurobankholdings.gr) and in printed format by the Group Company Secretariat (10 Filellinon str., 10557)