

INFORMATION TO THE SHAREHOLDERS OF ATTICA BANK BANKING SOCIÉTÉ ANONYME ON THE PROCESSING OF THEIR PERSONAL DATA IN ACCORDANCE WITH REGULATION (EU) 2016/679 AND THE RELEVANT GREEK LEGISLATION

ATTICA BANK BANKING SOCIÉTÉ ANONYME, with registered office in Athens, at 3-5 Palaion Patron Germanou Str. (tel. +30210-3669000) (hereinafter the "**Bank**"), informs the natural persons who are shareholders of the Bank, the legal representatives and agents of its shareholders, the pledgees of its shareholders, anyone who has the right to vote and generally draws and/or exercises rights over the Bank's shares, their representatives, those exercising voting rights representing legal persons who will participate, either physically or remotely, in the Ordinary General Meetings of the Bank and in any adjourned, suspended or repeated meetings of the Bank (hereinafter referred to as "GM"), that, in its capacity as controller, the following data will be collected and processed by the Bank and by the Hellenic Central Securities Depository S.A. and that the Bank or third parties, on its behalf and at its request, will process personal data for the purposes of their participation in the Bank's Ordinary General Meetings, the exercise of voting rights at such meetings, registration in the shareholders' register and the fulfilment of the Bank's legal obligations, in accordance with Regulation (EU) 2016/679 and the relevant provisions of the applicable Greek legislation on the protection of personal data

1. What personal data do we collect and where do we collect it from?

- a) Your identification data: full name, father's name, mother's name, ID Card number, Tax ID number, Social Security Reg. Number, gender, nationality, date and place of birth, etc.
- b) Your contact details: postal and e-mail address, telephone number, Zoom account identifier (in the case of remote participation), etc.
- c) Number of shares.
- d) Bank account details.
- e) For shareholders who are also users of the electronic application "Zoom" from "ZOOM Video Communications Inc." the following personal data is collected, in addition to the above: your login data to the application, your DSS investment unit number, date of birth, whether you are a resident of Greece or not, data from your use of the application (indicative voting instructions), video and audio data during your remote participation in the General Meeting, etc..
- f) With regard to those entitled to vote and proxies, additional data is collected regarding your status on the basis of which you are entitled to vote and relevant supporting documents.
- g) Data on correspondence and communications in general and data from any documents you provide.

The above data is collected either directly by you or by third parties authorised by you or by the company Hellenic Central Securities Depository S.A. In the event you provide the Bank with personal data of third parties, you must have previously informed them properly (indicatively, and where required, by reference and herein) and obtained their consent, where required.

2. Why does the Bank collect your data and how does in process such data?

Your personal data mentioned above (Chapter 1) is processed for the Bank's compliance with the obligations imposed by the applicable legal, regulatory and supervisory framework, as well as the decisions of any public authorities or courts, as well as for the protection of the rights and fulfilment of the legitimate interests of the Bank, for the purposes set out below:

- a) In order to identify you.
- b) In order to communicate with you.
- c) In order to verify the possibility and legality of exercising your rights as shareholders of the Bank, in accordance with Law 2190/1920 on sociétés anonymes, as currently in force (participation in the General Meetings of the Bank and exercise of voting rights in them, registration in the shareholders' register, fulfilment of the Bank's legal obligations, etc.).
- d) For your eligibility to participate in the Ordinary General Assembly in person.
- e) For your remote participation in the Ordinary General Meetings and the subsequent creation and use of an electronic account of the Shareholder or his/her representative, if any, in the online platform developed by Hellenic Exchanges - Athens Exchange Group for the provision of services for the remote holding of Ordinary General Meetings, in real time, via video conference, to issuing companies on the website <https://axia.athexgroup.gr>.
- f) For the fulfilment of the Bank's obligations towards you as its shareholders (e.g. payment of dividends).

3. Who are the recipients of your data?

Your personal data may be transferred to the following persons:

- a) The Bank's administration and/or the Bank's employees who are responsible for identifying you and checking the legality of the exercise of your rights as shareholders of the Bank.
- b) To lawyers, law firms, court bailiffs, experts, expert witnesses, in any case of legal actions relating to your status as a shareholder of the Bank or preliminary investigations, inquiries or criminal prosecutions related in any way to your status as a shareholder of the Bank.
- c) To natural persons and data processing companies for the purposes of controlling and updating data (including updating your contact details, in case you have failed to notify the Bank of the relevant change), as well as to IT applications maintenance service providers, provided that data privacy is respected in each case.
- d) To the company Hellenic Central Securities Depository S.A.
- e) To supervisory, independent, judicial, public and/or other authorities within the scope of their competences.
- f) To other shareholders and officials of the General Meeting.

4. Transfer of your personal data to third countries outside the EU.

We may transfer your personal data to third countries outside the EU in the following cases:

- a) If an implementing act of the European Commission has been adopted on an adequate level

of protection of personal data in the country concerned, or

(b) where you have provided the Bank with your express consent; Or

(c) where the Bank has an obligation to do so under a provision of law or an international agreement or a court decision; or

d) in the context of the Bank's compliance with the rules of automatic exchange of information in the tax sector, as they result from Greece's international obligations (e.g. FATCA); or

(e) where the transfer is necessary for the establishment or exercise of the Bank's rights or for the defence of its interests.

Please note that in order to fulfil in particular the obligations under (d) or (e) above, we may forward your personal data to competent national authorities in order to be transferred through them to the respective authorities of third countries.

5. How long do we retain your personal data?

Your personal data will be retained for the time necessary for the fulfilment of the purpose served by their processing, otherwise for the period of time required by the applicable legal and/or regulatory framework or the exercise of claims and the defence of the Bank's rights and legitimate interests.

In case you lose your shareholder capacity for any reason, your data will be retained until the completion of the general statutory limitation period for claims, i.e. for a period of up to twenty (20) years from the termination of your shareholding relationship with the Bank in any way.

If court proceedings involving the Bank are in progress until the expiry of the twenty (20) years, this period of retention of your personal data will be extended until the issuance of an irrevocable court decision.

Especially for the data collected for your participation and voting in the General Meeting remotely or in any repeat General Meeting, where the creation and use of an electronic account of the Shareholder or his/her representative, if any, in the online platform of the website <https://axia.athexgroup.gr> which has been developed by the Hellenic Exchanges - Athens Exchange Group and is provided by the company "HELLENIC CENTRAL SECURITIES DEPOSITORY S.A." to issuing companies for the provision of services for holding General Meetings remotely in real time via videoconferencing and through the ZOOM group of tools/services by ZOOM Video Communications Inc., we inform you that your personal data is handled in accordance with the Privacy Policy of the Hellenic Exchanges - Athens Exchange Group.

6. What rights do you have for the protection of your personal data and how can you exercise them?

1) You have the following rights to protect your personal data:

a) To know which personal data we hold and process, their origin, the purposes of their processing, the recipients, as well as the period of their retention (right of access).

b) To request the rectification and/or completion of your personal data so that they are complete

and accurate (right of rectification). In such cases, you must provide any necessary document showing the need for the rectification or completion.

c) To request the restriction of processing of your personal data (right of restriction).
d) To refuse and/or object to any further processing of your personal data retained by us (right to object).

(e) To request the erasure of your personal data from the records we hold (right to be forgotten).

II) To exercise your above rights, you may address your requests to the Bank's Data Protection Officer (DPO) at the mailing address Attica Bank, Data Protection Office, 3-5 Palaion Patron Germanou Str, P.O. Box 105 61 Athens, marking "For the attention of the Data Protection Officer" or at the e-mail address (e-mail) dpo@atticabank.gr.

If you believe that your rights are being violated in any way, regarding the protection of your Personal Data, you are entitled to appeal to the Personal Data Protection Authority (hereinafter referred to as the "DPA") for issues relating to the processing of your personal data. For the authority of the DPA and how to file a complaint, you can visit its website (www.dpa.gr → My rights → Submitting a complaint), where detailed information is available.

The following is noted in relation to the above rights:

- The Bank is in any event entitled to refuse to comply with your request for restriction of processing or erasure of your personal data if the processing or retention is necessary for you to continue to be shareholders of the Bank, for the exercise of your rights as shareholders of the Bank, as well as for the establishment, exercise or support of the Bank's legitimate rights or the fulfilment of its obligations towards you as shareholders of the Bank
- The exercise of your rights does not involve any costs charged to you. However, if your requests are manifestly unfounded, excessive or repetitive, we may either ask you to bear the costs involved, of which we will inform you, or refuse to undertake such costs.

7. How do we protect your personal data?

To ensure the security of your data, the Bank has established and applies procedures and systems for the privacy of your personal data and its processing, as well as for the protection of your personal data against accidental or unlawful destruction, accidental loss, alteration, unauthorised disclosure or access and any other form of unlawful processing, including access controls, physical and logical security, Data Loss Prevention and back-up outside the Bank.

The aforementioned information replaces any previous information on the processing of your personal data during your participation in the Ordinary General Meetings.