



## PRIVACY NOTICE FOR THE SHAREHOLDERS OF CREDIABANK S. A. ON THE PROCESSING OF THEIR PERSONAL DATA

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CrediaBank S.A., with registered office in Chalandri, at 260-262 Kifisias Avenue, (tel. +30 210-3669000) (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 Euronext Clearing Assets. 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 the fulfilment of the Bank's obligations towards you as its shareholders (e.g.

payment of dividends).

e) For the maintenance and management of the Shareholders' Book, in accordance with the provisions of the applicable legislation.

(f) To carry out over-the-counter transfers of shares.

(h) To respond to the Bank's requests, to process your requests in the context of services provided by the Bank (e.g. issuance of certificates), to provide answers and clarifications on specific questions or requests addressed to the Bank.

(i) the keeping of a historical record of the Bank's Shareholders.

### **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 and legal persons, to whom the Bank assigns the execution of specific tasks on its behalf, (processors), such as, among others, database management companies, the Bank's call center service companies, record storage and management companies, postal service providers, development, maintenance, IT application customization services, e-mail service providers, web hosting services, internet, including cloud services, statutory auditors, accountants or audit firms, subject to confidentiality in all cases.

d) To the company Euronext Securities Athens and to any sub-contractors of the videoconferencing service, such as the respective teleconferencing service provider.

e) To supervisory, independent, judicial, public and/or other authorities within the scope of their competences.

f) To other shareholders, where applicable, according to the law.

#### **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 (c) or (d) 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.

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

I) 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:

- to the Data Protection Officer (DPO) of the Bank either by e-mail at [dpo@crediabank.com](mailto:dpo@crediabank.com) or by mail to the following postal address: CrediaBank S.A., 260-262 Kifisias Avenue, PC 152 31, Chalandri
- to the Bank's Branch Network by filling in the Exercise of Rights form
- on the website of the Bank [www.crediabank.com](http://www.crediabank.com), by filling in the contact form.

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 Hellenic 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](http://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, 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.

## **8. Update - Amendment of this Update**

This form replaces any previous information on the processing of cookies for the processing of your personal data. The Bank may amend/supplement/update this information in accordance with the applicable regulatory and legislative framework. In this case, the updated information will be posted on the Bank's website, at <https://www.crediabank.com/en/personal-data-protection-gdpr/> and will be available in printed form on its network of Branches.

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