

CUSTOMER INFORMATION AS REQUIRED BY ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

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I. Data Controller and Data Protection Officer (DPO)

The "Data Controller" is
PRONTOPEGNO ENEXYPO ΑΓΟΡΑ ΧΡΥΣΟΥ.
Solonos Street 75 - Athens 106 79, Greece

Email address privacy@prontopegno.gr.

The Data Controller has appointed a Data Protection Officer ("DPO"), whom you may contact to exercise your rights, as well as to receive any information relating to them and/or this document, by writing to privacy@prontopegno.gr.

The Data Controller and the DPO shall handle your request, also through designated functions, and shall provide you, without undue delay and in any event within one month of receipt of the request, with the information on action taken in relation to your request.

We inform you that where the Data Controller has doubts concerning the identity of the natural person making the request, the Data Controller may request the provision of additional information necessary to confirm the identity of the data subject.

II. Finalità e modalità del trattamento

PRONTOPEGNO ENEXYPO ΑΓΟΡΑ ΧΡΥΣΟΥ (the "Company") informs you that the personal data it holds, provided directly by the data subject, may be processed, including by Companies in the Banca Sistema Group or third-party entities, for the following purposes:

1. Compliance with the obligations of laws, regulations, EU directives or instructions given by the competent authorities, supervisory and control bodies (such as the obligations under anti-money laundering legislation). The provision of personal data for the above purposes is obligatory and the consent of the data subject is not required for them to be processed.
2. Purposes closely related to and instrumental in managing customer relations as part of the activities carried out by the Company under its Articles of Association and by law (e.g. acquiring pre-contractual information, executing transactions - including occasional ones - on the basis of obligations deriving from a contract with the customer, evaluations and assessments of accounts, and the related risks). The provision of personal data for the above purposes is **not mandatory**, but refusal to provide them may, depending on the relationship between the data and the requested service, mean that the Company is unable to provide the service. Processing of the above data **does not require the consent** of the data subject.
3. Direct and indirect marketing purposes such as: **a)** Carrying out activities that are key to the presentation and promotion of products and services supplied by the company (direct marketing), including by telephone contacts and through automated systems (email, SMS, MMS, fax) and other forms of communication; **b)** Recording the level of customer satisfaction with the Company's services and activities, by personal or telephone interviews, questionnaires etc., including by third-party entities; **c)** Promotion and sale of products and services of companies in the Banca Sistema Group or third-party entities, including through automated systems (SMS, MMS, fax and email); **d)** Disclosure or transfer of data to third parties for marketing information, market surveys, direct offers of their products and services by sending promotional and commercial communications with traditional (such as telephone calls with an operator and traditional mail) and/or automated (such as fax, SMS, MMS and e-mail) methods of contact. The provision of personal data for the above purposes is optional and the **consent of the data subject is required**. The absence of consent will have no impact whatsoever on the relations between the parties as the consent can only lead to an improvement in the service. The consent may be withdrawn at any time by notifying the Data Controller.

The data will be processed manually, digitally and electronically using methods strictly related to the above purposes and in any event in a way that guarantees the confidentiality and security of the data.

III. Categories of personal and special data

The personal data that the Company processes include, by way of example, personal details, data acquired from payment orders. No data belonging to special categories (sensitive data) are processed.

IV. Persons who may receive the data or who may become aware of them as data processors or persons in charge of data processing

In connection with its activities, the Company may provide your data to:

- Parties identified by law (e.g. for purposes linked to carrying out duties related to management, assessment, litigation; for purposes linked to the administration of justice);
- companies belonging to the Banca Sistema S.p.A. Banking Group or in any case subsidiaries or associated companies, including in relation to anti-money laundering/anti-terrorism obligations;
- parties whose products and services are offered by the Company;
- parties providing services related to management of the Company's information system and IT programmes;
- providers of document archiving services;
- providers of customer assistance services (e.g. by telephone);
- parties involved in the management of payment and online collection and cash flow management services;
- operators of national and international fraud control and prevention systems;
- parties working to investigate and fight international terrorism;
- debt recovery agents;
- consultants;
- providers of market research and market survey services or service quality surveys, or parties involved in the promotion of products offered by the Company or by third parties;
- parties who control, review and certify the operations carried out by the Company, also in the interests of customers;
- entities resulting from the conversion, merger or demerger of the Company.

Parties in the categories reported above eligible to receive personal data will handle them as Data Controllers or Data Processors (as defined by law) within the scope of the existing contractual relationship. The following categories of natural persons may also receive personal data in their capacity as authorised data processors, in relation to the information required to fulfil their duties: employees of the Company or of the companies in the Banca Sistema Group, temporary workers, trainees.

V. Rights of the Data Subject

The exercise of the rights indicated in this section is not subject to any form of restriction and is free of charge, unless it is manifestly unfounded or excessive within the meaning of Article 12(5) of the EU Regulation. The Data Controller and the DPO shall be obliged to provide information on action taken by the data subject without undue delay and within one month of receipt of the request. Extensions are permitted under Article 12(3) of the EU Regulation. In relation to the processing described in this information notice and in accordance with Articles 13(2) (b), (c) and (d), 15, 16, 17, 18, 19, 20, 21 and 22 of the EU Regulation, as the data subject you may exercise the following rights:

- **right of access**, or to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed and, where that is the case, to obtain access to them;
- **right to rectification**, or the right enabling the data subject to obtain from the data controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- **right to erasure ("right to be forgotten")**, or the right that allows the data subject to obtain from the Controller the erasure of personal data concerning him or her without undue delay where one of the grounds provided for by the regulation exists;
- **right to withdraw** the prior consent at any time, without affecting the lawfulness of processing based on the consent before its withdrawal;
- **right to restriction** of processing in cases where: 1) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; 2) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; 3) the personal data are required by the data subject for the establishment, exercise or defence of legal claims; 4) the data subject has objected to processing pursuant to Article 21 of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject;
- **right to data portability**, namely that the data subject shall have the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format and have the right to transmit those data to another Data Controller without hindrance from the Data Controller to which the personal data have been provided, where the processing is based on consent or a contract, and is carried out by automated means;
- **right to object**, the data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her when the processing is carried out for the pursuit of the legitimate interest of the Data Controller. The Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the rights of the data subject or for the establishment, exercise or defence of legal claims;
- **right to object to direct marketing**, the data subject shall have the right to object at any time to processing of personal data concerning him or her for direct marketing purposes. The Data Controller shall refrain from further processing personal data for the related purpose.
- **right to lodge a complaint** with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) if you believe that your rights have not been respected. The contact details of the Italian Data Protection Authority can be found at www.dpa.gr;
- right to obtain, in the case of an automated decision-making process, information on the logic involved in the processing in question, and to request human intervention by the Data Controller, and to be able to express his or her opinion or contest the processing.

Any rectification or erasure of personal data or restriction of processing carried out upon request from the data subject - unless it proves impossible or involves disproportionate effort - shall be notified by the Data Controller to each recipient to whom the personal data have been disclosed. The Data Controller may inform the data subject about those recipients if the data subject requests it.

In order to exercise the aforementioned rights and communications, please contact: PRONTOPEGNO ENEXYPO AΓOPA XPYΣOY, Solonos Street 75 - Athens 106 79, Greece (e-mail: privacy@prontopegno.gr) and the DPO (see point I).

VI. Processing methods and Data storage times

Your Personal Data will be processed manually, digitally and electronically and in any event in a way that guarantees the confidentiality and security of the data. The personal data processed by PRONTOPEGNO ENEXYPO AΓOPA XPYΣOY are stored for the time necessary to manage the existing relationship and in compliance with the legal obligations laid down by the law. In particular, in the event of termination of the relationship with customers, the personal data will be stored from the date of termination of the relationship, for a period of approximately 10 years, in order to comply with the legal provisions on the storage of accounting records. The personal data may be processed for a longer period for judicial purposes, tax audits or for compliance with anti-money laundering legislation.

VII. Transfer of personal data to third countries

Your personal data may be transferred outside the European Union or the European Economic Area (so-called Third Countries). The Company guarantees as of now that the transfer will be carried out in compliance with the applicable legal provisions by stipulating, if necessary, agreements guaranteeing an adequate level of protection and/or by adopting the standard contractual clauses laid down by the European Commission. For further information, please contact the DPO, by writing to privacy@prontopegno.gr.