



## **PRIVACY NOTICE**

### **Information on Personal Data Processing in the context of e-banking**

#### **Introduction**

We would like to assure you that for AEGEAN BALTIC BANK S.A. (hereinafter referred to as "AEGEAN BALTIC BANK" or the "Bank") the personal data protection is of paramount importance. For this reason, we are taking appropriate and necessary measures to protect the personal data we process and ensure that the processing of personal data is always carried out in accordance with the obligations laid down by the applicable legal framework, both by the company itself and by third parties who process personal data on behalf of the Bank.

#### **Data Controller – Data Protection Officer (DPO)**

AEGEAN BALTIC BANK, having its registered office at Amarousio, at 91 Megalou Alexandrou & 25 Martiou streets, postal code 151 24, with Tax Identification Number 099937684, email: [aegean.baltic@ab-bank.com](mailto:aegean.baltic@ab-bank.com), tel: (+30) 210-6234110 website: <https://aegeanbalticbank.com>, informs that, for the purposes of providing financial services through e-banking, it processes personal data in accordance with the applicable national law and the European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, hereinafter referred to as the "Regulation") as it is currently in force.

The Data Protection Officer directly (DPO) of the Bank is the law firm PISTIOLIS - TRIANTAFYLLOS & ASSOCIATES LAW FIRM – ANDERSEN LEGAL (contact details: [dpo@ab-bank.com](mailto:dpo@ab-bank.com)).

#### **Which categories of personal data do we process?**

Your personal data that we collect, and process are the absolutely necessary, required and appropriate to achieve our objectives. More specifically, the personal data collected to achieve such objectives are divided into the following two categories:

**A.** Personal data that you provide us, upon submission of your request for the activation of e-banking service, in order to conclude electronic banking transactions, such as:

- Identification and legalization data (name and surname, date and place of birth, identity card and passport details, Tax Identification Number, competent Tax Office etc);
- Contact details (address, landline or mobile phone number, e-mail address);



- Data regarding your professional status, such as your profession, the company name, its activity etc.
- Your username, which is a unique password that serves as your identity to enter the Service, along with your IP address and the country of the latter's origin. This is how a personalized page in the e-banking service of the Bank is created, wherein all your personal details and information relating to you have been registered. You can access this personalized content through your username and personal password.
- Data from the use of electronic or/and digital products and services of the Bank (i.e. ID cookies), according to the special terms governing them.

**B.** Personal Data which we collect, in order to perform the contract we have concluded with you. More specifically, we process data of financial nature, which are required to perform the bank transactions you wish to carry out, such as for instance payments, money transfers, monitoring statements etc. Furthermore, we collect data from the contractual relationship with our Bank and the use of products or services that have been provided to you.

### **Sources of Data**

The personal data processed by the Bank are held in written or/and electronic means.

We highlight that with regards to the personal data collected directly by you under your customer status upon filling the request for e-banking account opening, you must inform us on any amendment thereof, without undue delay, as well as respond to any Bank's request for their relevant update (please see below in respect of the right to rectification); otherwise the Bank has the right to seek them in any lawful manner.

### **How and why we use your personal data?**

#### **• For the performance of bank transactions through e-banking service and in general in order to meet our obligations towards you**

We use the data required in order to perform the actions you choose to complete through e-banking service, such as indicatively and not exhaustively to monitor the history of your statements, to get updates with respect to your card, to proceed with transfers to accounts within the Bank or to another Bank, to be informed with respect to your loans, the payment schedule etc).

#### **• For our communication with you and the management of our relationship with you**

We may need to contact you by email or phone for administrative purposes and in general, for customer service either when you request the service provision or while the service is provided to you.



- **For the support of banking operations and the smooth provision of our banking services**

We process your personal data in order to handle any kind of complaints to ensure the smooth provision of our banking services.

- **For the amelioration of our services and the protection of our business interests**

The business purposes for which we will use your information help us improve our services and meet your expectations.

- **For the prevention of criminal acts and the compliance with legal obligations**

We process your personal data to conduct customer due diligences, transaction and name authentication checks, banknote authentication & suitability checks, risk identification and, in general, the implementation of measures to prevent and detect criminal offenses such as fraud, terrorism and money laundering, as well as other legal obligations arising from our legislative and regulatory framework governing our operation (such as for instance in the context of the mandatory automated information exchange in the fiscal sector), the acts of the Governor of the Bank of Greece which is our supervisory Authority and the Code of Civil Procedure. In the same context, we use systems for the identification of our customers and the transactions executed by them, and their processing, on the basis of relevant models, by conducting checks into international lists of politically exposed persons or imposition of sanctions in order to investigate suspicious or unusual transactions for the prevention of illegal activities.

- **For the safeguard of our legitimate interests, such as the reliability and safety of transactions**

We process your personal data in order to ensure network security and banking applications operation, IT support and security of banking transactions.

- **For the provision of access to our online platform**

We process your personal data in order to provide access to our online platform.

### **Which are the legal grounds for processing our personal data?**

The personal data you provide us are processed only when we have legal grounds to do so.

Legal grounds for processing your personal data are:

(a) the necessity of the processing of your data in the context of the fulfilment of our contractual obligations or during the pre-contractual stage upon your request for the provision of our services;

(b) the safeguarding and protection of our legitimate interests, which may entail the



network security and banking applications operation; the IT support and banking transactions security, the establishment, exercise and defense of legal claims; the organization and development of the business activity; the reliability and security of transactions;

( c ) the compliance with a statutory obligation, which may entail in particular tax law, including the applicable legislation within the framework of mandatory automatic exchange of information in the tax area for the prevention of tax evasion (including the obligation of information submission on cross-border transactions potentially bearing an aggressive tax design), the legislation governing our operation as a credit institution and societe anonyme, the provisions of the Code of Civil Procedure, the individual Acts of the Governor of the Bank of Greece, the Committee of Bank and Credit Issues & the Executive Committee of the Bank of Greece, as well as the legislation for the prevention and combating of money laundering and terrorism financing, along with the implementation of the legislative and regulatory framework on payment services (PSD II) and on markets in financial instruments (MiFiD II).

(d) the necessity of the processing of your personal data in the context of the performance of a duty performed in the public interest, such as, for example, for the execution of a prosecutor's order or upon implementation of measures aiming at preventing money laundering and terrorism financing;

(e) the manifest disclosure of your personal data on your own initiative of special categories of personal data, as the case may be.

### **Where do we disclose your data?**

Aegean Baltic Bank informs you that it shares your personal data with the following categories of recipients:

#### **• Bank's Employees**

To the Bank's employees, who are responsible for the evaluation of your requests, the management and the operation of your contract with the Bank, as the case may be, the fulfilment of the obligations arising therefrom, as well as the relevant obligations imposed by the law. Your personal data are treated in the strictest confidence and confidentiality, since the employees who process your personal data have an adequate and sufficient level of knowledge for their protection and are bound by confidentiality clauses or are under a statutory obligation of confidentiality.



- **Other banking institutions or/and companies/organizations which are payment services & payment processing services providers.**

Providing information to other banking institutions e.g. for the performance of a transaction that you requested through e-banking service and to companies/organizations which are payment services & payment processing services providers (such as DIAS, SWIFT, VISA etc). Furthermore, and in accordance with the Law 4537/2018 we might disclose details of a customer, common with another banking institution, to the banking institution that submits the relevant request, following the request of the common customer.

- **Governmental authorities, Law enforcement agencies in the context of the exercise of their competences, supervisory authorities of credit institutions, such as the Bank of Greece, the European Central Bank, the Single Supervisory Mechanism**

We may share your information with the relevant services, law enforcement agencies and other third parties where the law permits us to do so, for the purpose of preventing or detecting criminal offenses, executing confidentiality lifting orders- provision of customer accounts details and orders on seizing of accounts. It is noted that according to law 4170/2013 on Administrative Cooperation in the tax sector, as amended, amongst others with the laws 4378/2016<sup>1</sup> and 4714/2020<sup>2</sup> and is currently in force, along with the law 4428/2016<sup>3</sup> and law 4493/2017<sup>4</sup> as in force, we are required to collect and transfer to the competent authority of the Ministry of Finance personal data of our customers (or/and any third parties included in the transaction in the case of the declared cross-borders arrangements) for further transfer to the competent participating tax authorities abroad.

- **When outsourcing to external partners (legal persons where the Bank assigns certain tasks on its behalf)**

It is likely that your data are disclosed to our external partners (legal persons where the Bank assigns certain tasks or the provision of certain services on its behalf) in order for the partners to perform the tasks or/and provide their services on behalf of the Bank or individually in the cooperation context with the latter, as the case may be (i.e debit cards, electronic transactions and e-banking platform technical or operational support services.)

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<sup>1</sup> On mandatory automatic information exchange in the tax sector - DAC 2.

<sup>2</sup> On mandatory automatic information exchange in the tax sector with respect to declared cross-border arrangements - DAC6

<sup>3</sup> On validation of the multilateral agreement of the competent authorities on automatic information exchange on financial accounts of the Organization for Economic Co-operation and Development (CRS).

<sup>4</sup> On validation of the Memorandum of Understanding and Agreement of the Hellenic Republic and the USA Government for the improvement of international tax compliance and the implementation of the law on tax compliance of accounts held abroad (Foreign Account Tax Compliance Act, FATCA).



- **To bodies co-financing or providing guarantees, domestic or foreign, such as the Hellenic Deposit and Investment Guarantee Fund (TEKE), the Greek State etc.**

### **Transferring your personal data to Third Countries**

Your personal data may be transmitted and stored in locations outside the European Union (EU) or the European Economic Area (EEA), including countries which may not have the same level of protection for personal information. Reasons for the transfer of your personal data may be the existing safeguards per recipient, such as an adequacy decision issued by the European Commission or standard contractual clauses, as approved by the European Commission and are in force. In the absence of such safeguards, the transfer may be based on a specific derogation in accordance with the requirements of the Regulation, such as the necessity of the transfer for the execution of a contract between the Bank and the data subject. In addition, personal data may be transferred when necessary for the establishment, exercise or defense of legal claims or when the transfer is required on the basis of a judgment issued by a court or administrative authority or on the basis of an international agreement or the legal interests of the Bank by way of derogation. In any case, we ensure that there is an appropriate protection level, and that the transfer is lawful.

### **Storage Time**

The data storage time is decided on the basis of the following specific criteria, as appropriate in each case:

When processing is required as an obligation under provisions of the applicable legal framework, your personal data will be stored for as long as required by the relevant provisions.

When processing takes place on the basis of a contractual relationship, your personal data will be stored for as long as it is necessary to perform the contract and for the establishment, exercise, and / or support of legal claims under the contract.

### **What are your rights with respect to your personal data?**

Any natural person whose data is being processed by Aegean Baltic Bank enjoys the following rights:

#### **Right of Access:**

You have the right to be aware and verify the legitimacy of the processing. So, you have the right to access the data and get additional information about how your data is processed.

**Right to Rectification:**

You have the right to study, rectify, update or amend your personal data by contacting the Data Protection Officer (DPO) at the above contact details by submitting relevant documentation.

**Right to Erasure ("Right to be forgotten"):**

You have the right to request the erasure of your personal data when we process them based on your consent or in order to protect our legitimate interests. In all other cases (such as, for example, where there is a contract, due to an obligation to process personal data as required by law, for reasons of public interest), this right is subject to specific restrictions or may not apply, depending on the case.

**Right to Restriction of Processing:**

You have the right to request a restriction on the processing of your personal data in the following cases: (a) when the accuracy of the personal data is questioned and until such accuracy is verified; (b) when you oppose the erasure of personal data and request (instead of erasure) the limitation of its use; c) when personal data is not needed for processing purposes, but is, however, indispensable for the establishment, exercise and support of legal claims; and (d) when you object to the processing and until it is verified that there are legitimate reasons that concern us and supersede the reasons for which you oppose processing.

**Right to Oppose Processing:**

You have the right to oppose at any time the processing of your personal data where, as described above, such processing is necessary for the purposes of legitimate interests we seek as data controllers, as well as for processing for direct marketing and consumer profiling.

**Right to Data Portability:**

You have the right to receive your personal data free of charge in a format that allows you to access, use, and edit it, using commonly used editing methods. You also have the right to ask us, if technically feasible, to pass the data directly to another data controller. This right exists for the data you have provided to us and is processed by automated means based on your consent or for the performance of a relevant contract.

**Process for the exercise of the aforementioned rights**

In order to exercise any of the above-mentioned rights you may refer to the Data Protection Officer (DPO) through the following contact channels:

1. by sending a relevant written request to the address of the Bank's head office at 91 Megalou Alexandrou & 25 Martiou str., PC 15124, Marousi;



2. by sending a relevant written request to the Bank's e-mail address [dpo@ab-bank.com](mailto:dpo@ab-bank.com);
3. in person, by completing and submitting a request form at a Bank's branch.

In any case of request submission, you must provide us with the following details: name and surname, address of residence, Tax Identification Number or Identity Card Number, e-mail address, date and subject of the request. In any case, for your convenience, the Bank makes available at its branches request forms for your convenience in case you wish to submit a relevant request for the exercise of your rights.

We will use our best endeavours to reply within thirty (30) days from the submission of the above requests. The said timeline may be extended by sixty (60) more days, if deemed necessary, taking into account the complexity of the request and the number of the submitted requests, in which case we will inform you accordingly within the aforementioned thirty-day period.

### **Right to file a complaint with the Data Protection Authority**

You have the right to file a complaint with the Hellenic Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)) through its portal <https://eservices.dpa.gr/> upon filling the relevant electronic form, depending on the type of complaint.

### **Personal Data Security**

Aegean Baltic Bank implements appropriate technical and organizational measures aimed at the safe processing of personal data and the prevention of accidental loss or destruction and unauthorized or/and unlawful access to, use, modification or disclosure thereof. In any case, the way in which the internet operates and the fact that it is free to anyone cannot guarantee that unauthorized third parties will never be able to violate the applicable technical and organizational measures by gaining access and possibly using personal data for unauthorized and / or unfair purposes.

### **Profiling – Automated decision-making process**

AEGEAN BALTIC BANK does not take decisions based exclusively on automated processing of personal data. It may, however, proceed to profiling -not always automated- without taking, though, an automated decision based on such profile, since no decisions are taken without human intervention.

The aforementioned profiling is performed amongst others in the context of Know Your Customer diligences in accordance with the regulatory framework upon account opening and customer management, aiming at preventing money laundering from criminal activities and terrorism financing. More specifically with respect to Know Your Customer diligence it is highlighted that the details collected are transferred in the respective system which on the basis of an algorithm classifies the customer in a specific risk scale depending on the



criteria inserted to this respect.

### **Amendments to the Privacy Policy**

The information in relation to this privacy policy relating to e-banking service of the Bank reflects the current situation of the data processing. In case of changes in the data processing, such information on data protection will be updated accordingly. In the e-banking service, the most recent version of such information on data protection will be always available, thus permitting you to be informed on the scope of the data processing. We recommend that you keep informed on the way we process and protect your personal data. All future changes regarding this Privacy Notice will be available through the e-banking service.

For more information regarding the personal data processing that the Bank carries out, you may read [here](#).

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