



## **NATIONAL BANK OF GREECE S.A.**

### **PRIVACY STATEMENT**

NATIONAL BANK OF GREECE S.A. (hereinafter “NBG”), as a Controller, acknowledges and gives top priority to its requirement to comply with the applicable regulatory and legal framework on banking secrecy and on the protection of individuals with regard to the processing of their personal data.

The purpose of this statement is to provide information to you as potential and/or existing customers and in general as persons carrying out businesses with NBG regarding the processing of your personal data, in the context of NBG's operation and of your overall transactional relationship with the latter pursuant to the provisions of the General Data Protection Regulation 2016/679 (GDPR) and in accordance with its specific regulatory framework.

With this statement, you will be informed about the following:

- I. Who we are (NBG’s contact details)**
- II. NBG’s General Principles on the processing of personal data**
- III. What personal data can be processed**
- IV. Which might be the purposes of processing**
- V. To which recipients can your data be communicated**
- VI. Provisions in the event of any personal data transmission to third countries (cross-border transmission)**
- VII. Duration for which your data is held**
- VIII. Action taken when the period of keeping your data has passed**
- IX. Your rights for the protection of your personal data**
- X. NBG’s obligations during your personal data processing**
- XI. Ensuring protection against phishing**
- XII. Installation of CCTV for security reasons**
- XIII. Recording of telephone conversations**
- XIV. E-services: internet banking - mobile banking – websites**
- XV. Update-amendments of the privacy statement**

## I. WHO WE ARE (NBG'S CONTACT DETAILS)

NATIONAL BANK OF GREECE S.A. is a public limited banking company, registered in the General Commercial Registry (GEMI), with the GEMI No. 237901000, website <https://www.nbg.gr>, headquartered in 86, Eolou street, 102 32, Athens. In the context of its operations, NBG offers a wide range of financial products and services that respond to the constantly changing needs of businesses and individuals.

## II. NBG'S GENERAL PRINCIPLES ON THE PROCESSING OF PERSONAL DATA

In the context of its operations, NBG ensures that the processing of personal data is effected under the following general principles:

- your data have been collected fairly and lawfully, with your consent where required, for a specific, explicit and legitimate purpose, and are fairly and lawfully processed in light of such purpose,
- the collected data are adequate, relevant and not excessive in relation to the purpose for which they are processed,
- the data are reviewed for accuracy and are regularly updated in accordance with the appropriate procedures,
- your data are kept in a form which permits identification of your identity for the period required for the purposes of processing,
- adequate security measures are taken to protect your data against such risks as loss, unauthorized access, destruction, unlawful processing or disclosure,
- before the processing of your personal data, you are properly informed and you provide your consent, where required, actively and on a voluntary basis . Your consent can be withdrawn at any time, without of course affecting the lawfulness of processing based on consent before its withdrawal.

*Your consent is not required in the following cases:*

- a) for the performance of a contract with NBG to which the data subject is party;
- b) in order to take steps at your request prior to entering into a contract;
- c) for compliance with a legal obligation to which NBG as controller is subject;
- d) for the protection of your vital interests,
- e) for the performance of a task carried out in the public interest or in the exercise of official authority,
- f) when the processing is necessary for the purposes of the legitimate interests pursued by NBG, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

## III. WHAT PERSONAL DATA CAN BE PROCESSED

NBG collects, maintains and processes the personal data you disclose or you have already disclosed to the Bank as potential or/and current customers and in general as persons carrying

out businesses with NBG at all stages of your transactional relationship in the context of the products /services provided by NBG or through it, as well as data arising from your bank statements and / or from previous grants of credit from the banking system. It is noted that NBG processes each time only the personal data which are necessary for such purpose. In particular, NBG may process the following personal data:

*Personal data that you provide to us, such as:*

- identification and legalization data (full name, date and place of birth, ID or passport, Social Security Number),
- demographic data (sex, nationality, family status), contact details (address, telephone number or mobile phone, email address),
- financial status data (salary, property, tax residence),
- access data for e-applications (e.g. i-bank login) and electronic identification data (e.g. e-signature).
- in exceptional cases data related to your health and living condition (e.g. in compliance with its responsibilities for responsible lending).

It is noted that you are required to inform NBG timely for any possible change on the aforementioned data.

*Personal data collected by NBG, such as:*

- in the context of due diligence, sanctions monitoring and anti-money laundering,
- in the context of monitoring and evaluating your creditworthiness, risk management of the Bank and in general within the customer service of your contractual or transactional relationship with NBG,
- in compliance with the current legislative and regulatory framework for the submission of data to the supervisory authorities,
- in the context of your correspondence and general communication with NBG,
- financial information evaluating your investment and financial status and behavior,
- cookies and relevant technologies that enable access and use of specific pages or/and website pages for statistical purposes,
- data, transferred by Supervisory, Judicial and other Public Authorities and Independent Authorities, which relate to criminal convictions, offences, enforcement actions to protect the Public interest, seizures, confiscations, commitments,
- data related to you which are publicly accessible either electronically or otherwise.

The personal data processed by NBG are held in physical and/or electromagnetic form.

*In particular regarding the protection of minors:*

NBG acknowledges the need to protect minors' data as defined by the current regulatory framework. Minors' data are stored by NBG only if provided by those having the custody of the minor and only for the fulfillment of a relevant business relationship for the benefit of minors. It is noted that under no circumstances does NBG deal directly with minors, nor its products and services are directed for immediate use by minors, and NBG deals only with those having the custody of minors.

#### IV. WHICH MIGHT BE THE PURPOSES OF PROCESSING

NBG may process the aforementioned personal data of yours, for the following purposes:

A) In the context of the performance of a contract or before its conclusion, in particular:

- i. for the identification and verification of your information,
- ii. for communicating either at pre-contractual stage or on issues related to your transactional relationship with NBG,
- iii. for the service, management, monitoring, and process of your transactions and in general for the offer of the requested product and/or service of NBG,
- iv. for the service of any transaction form through e-services (transactions through alternative networks),
- v. for collecting the required information in order to evaluate the availability of providing a product or service.

B) As part of NBG 's compliance with the obligations established by the applicable legal and regulatory framework in force, in particular regarding:

- i. the prevention and suppression of money laundering and terrorism financing,
- ii. the implementation of existing legislation on State aid and tax legislation, including the provisions on the automatic exchange of information for tax purposes,
- iii. the evaluation of the data subjects' creditworthiness, where required for the performance of their transactional relationship,
- iv. the assessment of compatibility and any other assessment or categorization of the customer, as appropriate, for the creation or provision of a financial product or service,
- v. the recording and filing of all the customers' requirements for executing transactions on financial products, including the obligation of recording their requirements provided by telephone call,
- vi. the notification and transfer towards the competent Supervisory, Independent, Law Enforcement, Judicial and Public Authorities in general, as well as third-party legal entities that are duly authorized, when required in accordance with the applicable legislation.

C) In the context of NBG's lawful operation, the safeguarding of its interests and the overall orderly functioning and protection of your transactions, in particular with regard to the collection and/or analysis of data relating inter alia to:

- i. your interests, your preferences and your overall transactional activity in the context of the development and /or improvement of NBG 's products and services,
- ii. resolving potential requests/complaints of yours,
- iii. risk assessment and risk management in the context of the NBG 's operations,
- iv. preventing and dealing with cases of fraud and other illegal activities for the protection of the public and the safety of the personnel, including the video surveillance system,
- v. in case of transfer, concession (either directly or as collateral) and/or securitization of any or total of burden, claims, guarantees, liens, securities under any agreement of the client with NBG, towards any third party(ies).

D) In the context of informing you on behalf of the NBG regarding new products and/or services (i) of NBG and its Group Companies and (ii) Third-Party Companies, which are available to NBG, and match your interests and preferences, provided that you have provided your explicit consent to that end. In this case, you are informed that you have the right to withdraw your consent at any time, without affecting the legitimacy of the processing that was based on consent, prior to its withdrawal.

*In particular with regard to automated decision making, including profile creation:*

In specific cases, such as when it is required for the conclusion or execution of your contract with NBG or upon your explicit consent, processing of your data may also be carried out through automated procedures resulting in decisions based on statistical analysis of the particular parameters that make it possible to objectively evaluate your requests and overall transactions with NBG.

## V. TO WHICH RECIPIENTS CAN YOUR DATA BE COMMUNICATED

Recipients of the data that NBG is obliged or entitled to disclose, by law or regulation or court order or in the context of lawful operation of the data subjects' business and contractual relationship with NBG, may be third parties (natural or legal persons), public authorities, services or other bodies, such as:

(a) National Bank of Greece Group companies, such as (i) NBG Securities, (ii) NBG Factors, (iii) Ethniki Hellenic General Insurance S.A., (iv) NBG Asset Management Mutual Funds, (v) Ethniki Leasing S.A. (vi) Pronomiouhos S.A. Genikon Apothikon Hellados, as well as any persons (individuals or legal entities) cooperating with NBG in any form, acting in the name and on behalf of NBG, in order to achieve the purpose of processing the contract (such as Advisors or Affiliates, subsidiaries or branches of NBG abroad),

(b) third parties, natural or legal persons, acting by order and on behalf of NBG, including the following categories:

- i. Companies informing debtors and/or guarantors of their debts prior to or after termination and/or the preparatory actions required for the out-of-court and judicial pursuit of the collection by NBG of their overdue debts in accordance with the provisions of Law 3758/2009, as in force,

- ii. Credit servicing firms under Law 4354/2015, as in force
- iii. Record keeping and destruction companies,
- iv. Contact center services companies,
- v. Supply and support of information systems companies,
- vi. Analysis and market research and product promotion companies,
- vii. Guard and security companies,
- viii. Custodianship Services Companies
- ix. Advisory firms, including financial advisors and auditors of NBG,
- x. Data reporting providers,
- xi. Insurance companies and insurance intermediaries in the context of the provision of insurance products,
- xii. Property valuers.

(c) Companies to which NBG 's claims are transferred, such as Special Provisions Purpose Companies, in the context of securitization of receivables and Credit Acquisition Firms under Law 4354/2015, as in force.

(d) National or European Institutions in the context of acting alongside NBG for the purpose of provision of credit to those carrying out transactions with NBG.

(e) "Interbanking Systems S.A." ("DIAS SA") for the servicing of interbank transactions, "TIRESIAS SA" for the protection of credit and financial transactions, the Hellenic Deposit and Investment Guarantee Fund, the Hellenic Bank Association, Hellenic Exchanges S.A., Banks and Financial Institutions in Greece and abroad,

(f) Social Security Bodies, Public Institutions, Chambers of Commerce and Public Companies,

(g) Credit Institutions, Payment Institutions, Electronic Money Institutions, Investment Firms (Investment Services S.A.), Mutual Fund Management Companies (M.F.M.C.), Execution and Trading venues, Clearing and Settlement Companies and Systems, Trade Repositories,

(h) Supervisory, Judicial, Independent and Other Authorities at national and European level to meet NBG's obligation under law or regulation or court judgment, such as the Bank of Greece, the European Central Bank, the European Commission for Competition, the Hellenic Capital Market Commission, the Hellenic Competition Commission, US Securities & Exchange Commission (SEC), Financial and Economic Crime Unit (SDOE), Financial Police, Public Authorities in Greece and abroad, Courts, Prosecutions, Investigators, Notaries, Court Bailiffs, Mortgage Registries, Greek and Foreign Attorneys-At-Law,

(i) Certified Accountants and Auditing Firms.

It is noted that NBG will further inform you on any potential transfer of your data to the aforementioned recipients, provided that it is required from the current legislation.

NBG may disclose your personal data to competent Supervisory Authorities, Independent, Law Enforcement, Judicial and other Public Authorities, where required from the current legislative and regulatory framework, on a regular or exceptional basis, upon request or if it is required to report the said data without prior notification.

It is noted that when NBG entrusts the processing of personal data to third parties acting in the name and on behalf of NBG, they must comply fully with NBG's instructions, the said

compliance is achieved by specific provisions in the relevant contractual texts of outsourcing and in the observance of similar procedures.

## **VI. PROVISIONS IN THE EVENT OF ANY PERSONAL DATA TRANSMISSION TO THIRD COUNTRIES (CROSS-BORDER TRANSMISSION)**

In the context of its operations and in compliance with the provisions of the applicable regulatory framework, NBG may transfer/receive personal data to and/or from its subsidiaries, as well as interconnect specific files if necessary.

The said transfer or interconnection is effected in accordance with the provisions of European legislation on Companies registered in member states within the European Economic Area (EEA) or with the local legal framework as regards Companies registered outside the European Economic Area (EEA).

Personal data may only be disclosed to third countries outside the European Economic Area (EEA), if the foreign law provides for an adequate level of data protection. In case the foreign law does not provide an adequate level of data protection, personal data may only be transferred to such country if either the data subject has explicitly consented to the transfer, or if data protection is provided for by an adequate data transfer agreement (i.e. if you, as the data subject, have explicitly given your consent for this transfer).

NBG ensures, through appropriate procedures, that the required procedures are carried out by the local authorities, as well as that each Group Company involved ensures the safe processing of personal data transmitted or interlinked.

## **VII. DURATION FOR WHICH YOUR DATA IS HELD**

NBG processes your personal data throughout the duration of each contractual agreement with the Bank and after its termination or expiration as long as it is defined by the applicable legal and regulatory framework.

In particular, your data processed by NBG must be held throughout the period required for the purposes of processing in accordance with the purpose of their processing and/or the applicable legislative and regulatory framework.

After the end of this period, the data are held in accordance with the applicable legislative framework for the period provided from the termination of a business relationship or for the period required to protect NBG's rights before a Judicial or other competent Authority.

## **VIII. ACTION TAKEN WHEN THE PERIOD OF KEEPING YOUR DATA HAS PASSED**

In the event that the duration for keeping your data has expired, NBG pays special attention to how this data will be destroyed. For this purpose, it has established and implements a relevant procedure applied after having examined that it is not necessary to keep archives material for compliance with legal and regulatory requirements or for the protection of NBG's interests and is based on the instructions of the Hellenic Data Protection Authority. NBG shall ensure that the above process of file destruction containing personal data also binds third parties providing services in the name and on behalf of it and any other persons with whom it cooperates in the context of outsourcing or other kind of agreements.

## IX. YOURS RIGHTS ON THE PROTECTION OF YOUR PERSONAL DATA

Following the verification of your identity, you, as a Data Subject, have the following rights:

<b>Right to Information</b>	NBG must provide you with any information in relation to the processing of your personal data, including what data NBG processes, for which purpose, for how long NBG keeps them, in a concise, understandable and easily accessible form using clear and simple wording.
<b>Right of Access</b>	You have the right to obtain from NBG confirmation as to whether or not personal data of yours are being processed, and, if so, you have the right to access to the personal data.
<b>Right to Rectification</b>	You have the right to obtain from NBG the rectification of inaccurate or incomplete personal data of yours and the right to have incomplete personal data completed.
<b>Right to Erasure</b>	You have the right to obtain from NBG the erasure of your personal data, which can be met if certain conditions are met.
<b>Right to Restriction</b>	You have the right to obtain from NBG restriction of processing under certain conditions.
<b>Right to Object</b>	You have the right to object, at any time, to processing of personal data concerning you. NBG shall then no longer process your Personal Data unless it demonstrates compelling legitimate grounds for the processing, which override the interests, rights and freedoms of yours or for the establishment, exercise or defense of legal claims.
<b>Right to Obtain Human Intervention</b>	You have the right to ask from NBG not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
<b>Right to Portability</b>	You have the right to ask from NBG and receive your Personal Data that you have provided in a structured, commonly-used and machine-readable format or to ask NBG to transmit those data to another controller.

In order to further facilitate the exercise of your relevant rights, NBG ensures the development of internal procedures so as to respond timely and effectively to your relevant requests.

For the exercise of the aforementioned rights of yours, please submit your request by filling NBG's special forms available at any NBG store.

In case that you consider that the protection of your data is in any way affected, you may also lodge a complaint with the Data Protection Authority using the following contact details:

Website: [www.dpa.gr](http://www.dpa.gr) /

Address: 1-3 Kifissias Avenue, 115 23, Athens



Tel: +30 210 6475600

Fax: +30 210 6475628

email: [contact@dpa.gr](mailto:contact@dpa.gr)

## X. NBG'S OBLIGATIONS DURING YOUR PERSONAL DATA PROCESSING

### *A. Ensuring Confidentiality and Safety of Processing*

The processing of personal data shall be confidential and carried out exclusively by persons acting under the authority of NBG and/or the Group Companies. Such persons shall be chosen on the basis of strict qualifications established by the Group and providing sufficient guarantees in respect of knowledge (or specialized know-how where required) and personal integrity to ensure such confidentiality.

Moreover, to protect personal data, appropriate procedures based on high-level security standards have been incorporated in the network, and controls are carried out on a regular basis to ensure strict implementation of the criteria established by the Group for this purpose.

NBG implements appropriate organizational and technical measures to secure data and protects them against any data breach, such as an accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access as well as any other form of unlawful processing. Such measures must ensure a level of security appropriate to the risks presented by processing and the nature of the data subject to processing.

### *B. Security of IT systems*

To ensure confidentiality of all data held in its IT systems, NBG has established Policies and IT Security Manuals, to ensure:

- protection of the data handled by the data and voice networks used by NBG,
- efficient control of users' access to NBG's IT systems and protection of the data managed by these systems,
- identification and prevention, to the highest possible level, of any events of breach of the security of NBG's IT systems.

## XI. PROTECTION AGAINST PHISHING

To protect customers from phishing, i.e. malevolent attempts by third parties to scam customers into surrendering personal electronic data, NBG publishes notices in the press and provides instructions via its alternative networks proposing means of protection and describing the methods of phishing usually employed and the risks involved.

NBG makes it clear that under no circumstances will it ever ask from you, by any means whatsoever (phone, e-mail or any other means of contact), to disclose your personal data (ID particulars, bank account numbers, etc.) or codes (user ID, password), and that any such request should be deleted immediately and NBG notified accordingly.

## XII. INSTALLATION OF CCTV FOR SECURITY REASONS

To prevent theft of assets, avert criminal acts and protect customers and employees, NBG has installed Closed Circuit Television (CCTV) systems in its premises, where necessary.

The installation and operation of such systems is in conformity with the provisions of the applicable regulatory framework, including appropriate technical specifications, informing customers accordingly, length of time that CCTV data are held, etc.

The recording and preservation of personal data via NBG's CCTV and door security systems is in accordance with the applicable regulatory framework.

## XIII. RECORDING OF TELEPHONE CONVERSATIONS

NBG uses technical means for the recording of telephone conversations with clients for the provision of client transactions carried out from specified Bank Units within the framework of execution and provision of relevant trading activities in accordance with the applicable regulatory framework in force. In these cases, there is specific information provided to the clients as well as to the colleagues before the recording of the telephone conference takes place.

## XIV. E-SERVICES: INTERNET BANKING - MOBILE BANKING – WEBSITES

If you make use of NBG's website, you should be aware that NBG collects personal data of visitors / users of its website only when they voluntarily provide them for the purpose of providing electronically available services (e.g. e-services i-bank Internet Banking and Mobile Banking, a submitted request from a user, for information on a NBG's product and / or service updates, comments / suggestions on behalf of the visitors / users). The personal data collected on the web site depend on the requested, each time, service from the visitor / user and may be name, surname, identity card, age, gender, occupation, Tax Registry Number, address, telephone number, e-mail address. Where appropriate and depending on the service requested, it is optional for some of the above information to be filled in by the visitor / user. NBG may process part or all of the data provided by the visitors / users for the purpose of providing services that are available electronically as well as for statistical purposes and for improving the information services provided.

The website may include hyperlinks to other websites which are under the responsibility of third parties (natural or legal persons). Under no circumstances is NBG responsible for the terms of protection and management of the personal data that these websites follow.

### **Cookies**

NBG may collect data identification for visitors / users of its website by using relevant technologies such as cookies and / or Internet Protocol (IP) address tracking. Cookies are small text files that are stored on the hard drive of each visitor / user and do not access any document or file from someone's computer. They are used to facilitate visitor / user's access to the use of specific services and / or site pages for statistical purposes and in order to determine the areas that are useful or popular, as well as to assess the effectiveness of the site and to improve the performance of the site. These data may also include the type of browser used by the visitor / user, the type of computer, its operating system, Internet service

providers and other information of this kind. In addition, the site's information system automatically collects information about the visitor / user's site and about the links to third-party websites he may choose through the use of the NBG's website.

The visitor / user of the website may set its web browser in such a way as to either warn him or her about the use of cookies on specific services, or not allow the acceptance of cookies in any way. To do so, please refer to your network browser or help screen instructions to learn more about these features. For example, in Internet Explorer, you can go to Tools / Internet Options / Security and Privacy to customize the browser to its requirements.

If the visitor / user of the website does not allow the use of cookies for his identification, this may have an impact on the ability of NBG to provide certain services (e.g., it will not be possible to make i-bank Internet Banking and Mobile Banking) or information that may be useful to him.

Lastly, NBG can leverage the capabilities provided by Google Analytics, and in particular with Display Advertising, utilizing the remarketing features to promote its products and / or services online. In particular, third-party vendors, including Google, display advertising messages from NBG on various websites on the Internet. NBG and third-party vendors, including Google, use cookies (such as the Google Analytics cookie) or third party cookies (such as DoubleClick cookie) jointly to update, optimize, and serve advertising messages based on previous visits of someone on their site. Our site visitors / users may declare that they do not wish to be recipients of relevant messages and are excluded from future actions in Display Advertising and adjust Google Display Network ads using Ads Settings or enable the Google Analytics opt-out browser add-on, if they so wish, through the <https://tools.google.com/dlpage/gaoptout> link (looking for a further subscription at the <https://support.google.com/chrome/answer/187443?hl=en>).

## **XV. UPDATE-AMENDMENT OF THE SAID STATEMENT ON PERSONAL DATA PRIVACY**

NBG may update, supplement and / or amend this Privacy Statement in accordance with the applicable regulatory and legislative framework. In this case, the updated Statement will be posted on the NBG's website (<https://www.nbg.gr>) and will also be available in the NBG's branch network.