Notice on the Processing of Personal Data in accordance with the General Data Protection Regulation (GDPR)

In its capacity as controller, CrediaCrediaPantelakis Securities S.A. hereby informs you that, pursuant to Regulation (EU) 2016/679 of the European Union and the provisions of the Greek legislation on the protection of personal data, the company itself and/or third parties, by its order and on its behalf, will process personal data concerning the data subject (hereinafter the "Client"), in the context of fulfilling the transaction relationship for products or services provided by the Company (investment products and main and ancillary investment services) as follows:

1. What data does the Company collect and from where

a) Identification data such as name, father's name, gender, ID number, Tax Registration Number, date and place of birth, nationality and other demographic data, such as marital status.

b) Contact details such as postal and e-mail address, landline and mobile phone number.

c) Financial and property data, e.g. occupation, remuneration, tax clearance form and various tax information, e.g. tax forms.

d) Data demonstrating the client's trading behavior in the provision of investment services as required by relevant legislation.

e) Data relating to the investment services provided, showing the Client's knowledge and experience in the investment sector, their financial status, their risk tolerance level and their investment objectives.

f) Data relating to telephone conversations between the Company and the Client, which are recorded in accordance with the specific requirements of the applicable legislation.

g) Visual data from the video recording systems of the Company's premises, in which there are the relevant legal markings.

h) Data relating to the Client's identity details, which are provided through the electronic applications used, such as the Internet Protocol Address (IP Address) or other data provided through the devices used by the Client as location identification data, as well as navigation data on the Internet (cookies), which alone or in combination with unique identifiers, may be used to identify the Client.

The above data are collected directly from the Client and/or from publicly accessible sources and/or from the Company's electronic/information systems. The collection and processing of the above data by the Company is necessary for the initiation, execution and maintenance of the trading relations between the Company and the Client.

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57B Ethnikis Antistaseos Street, 152 31 Chalandri, **T:** 210 6965000 – **F:** 210 6929550 – **E:** pantelakis@pantelakis.gr
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Data collection also includes the collection of third party data acting on behalf of the Client. In any case, the Client must have obtained their consent and referred them to this notice.

2. The purposes for which the Company collects Client data and how these are processed

The data collected as above, either at the beginning of the trading relationship, and/or subsequently, shall be processed for the following purposes:

a) To identify and communicate with the Client for any trading, pre-contractual or contractual relationship with the latter, for the purpose of fulfilling the Company's contractual and/or legal obligations.

b) To conclude a contract with the Client, to execute it and to generally ensure the smooth operation and fulfillment of the Company's obligations to the Client.

c) To communicate with the Client in order to inform the latter about the investment services being provided and the content of his/her portfolio which is kept by the Company, for the better utilization of the products or services that are provided by the Company and about their progress.

d) To assess the credit risk that the Company is either called to undertake or has already undertaken, where the latter has concluded a contract with the Client for the granting of credit for the purchase of securities.

e) To monitor the progress of the relevant margin agreement, its debt as well as to seek the collection of any amounts due should the relevant obligation, in accordance with the performance of the contract which is an obligation of the Company by law and regulatory decisions of the supervisory authorities, but also against its shareholders, is breached.

f) To prevent and suppress money laundering and terrorist financing and to prevent fraud against the Company or its clients, as well as any other illegal act.

g) For the Company's compliance with the obligations imposed by the applicable legal and regulatory framework and the supervisory requirements, as well as with the decisions of authorities or courts.

h) To ensure the Company's compliance with obligations arising from the applicable legislation on market manipulation, as well as the prevention of situations of market manipulation and abuse.

3. Who are the recipients of the data

a) The Company's employees who are responsible for the opening of an investment account in the name of the Client, the registration of his/her personal data in the Company's systems for the handling and performance of the contract or contracts, the fulfillment of the

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obligations arising from the contracts in relation to the provision of the investment and ancillary services to the Client, as well as the related obligations imposed by the applicable legislation, who must also comply with the applicable legislation and the stock exchange secrecy. Also, the data protection officer, the regulatory compliance officer and the internal auditor for the purposes of performing their duties.

b) Individuals or legal entities, to whom the Company may entrust the execution of specific tasks on its behalf, such as, but not limited to, courier companies, lawyers, law firms, notaries and bailiffs, IT companies, provided they always comply with the professional secrecy and the duty of confidentiality and privacy.

c) Credit institutions, Investment Firms, Mutual Fund Management Companies based inside and/or outside the country, with which the Company cooperates to provide investment and ancillary services to the Client (execution of orders for the conclusion of transactions on financial instruments that are traded on regulated markets, as well as clearing and settlement services).

d) Operators of trading venues, such as the Athens Stock Exchange or the Dematerialized Securities System, clearing and settlement operators on financial instruments (ATHEX Clear), operators of compensation schemes (Hellenic Deposit and Investment Guarantee Fund).

e) Supervisory, independent, judicial, public and/or other authorities within the framework of their statutory competencies, duties and powers.

4. Transfer of Data to Non-EU Countries

The Company does not transfer the Client's personal data to countries outside the EU. If this is required in the future, it will only take place in the following cases:

a) where the European Commission has adopted an act on the adequate protection of personal data in that country or in that international organization;

b) where the Client has provided his/her explicit consent to the Company in case the transfer is required for the execution of the latter's order for the conclusion of transactions on financial instruments that are traded on a regulated market of the specific non-EU country, as well as the clearing of such a transaction;

c) where there is a relevant obligation by law or transnational or international convention;

d) where the transfer is necessary for the establishment, exercise or support of legal claims or the advocacy of the Company's rights;

e) as part of the Company's compliance with the rules of automatic exchange of information for tax purposes, as set out in the legal and regulatory framework.

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In order to fulfill the obligations under point (c) or (e) above, the Company may proceed to transfer the Client's personal data to the competent national authorities in order for the latter to forward same to the respective authorities of third countries.

5. Duration of personal data retention

Where a contract is concluded with the Company, the latter will keep the Client's personal data until the completion of the statutory limitation period of the claims, i.e., for a period of up to twenty (20) years from the expiration of the relevant contract in any way. If, until the expiry of the above period, court proceedings, which directly or indirectly involve the Client are in progress with the Company or any company affiliated with it, the aforementioned data retention period will be extended until the issuance of an irrevocable court decision. In case a shorter or longer data retention period is provided by law or by regulatory acts, the above data retention time will be accordingly reduced or prolonged. The contractual documents signed by the Client, which contain personal data, may, at the Company's discretion, be kept in electronic/digital format after a five-year period.

6. Rights of the data subjects

The Client has the following rights:

a) to be informed about which personal data relating to him/her are kept and processed by the Company, their origin, the purposes of their processing, the categories of their recipients, the time of retention (right of access).
b) to request the correction and/or completion thereof, in order to be complete and accurate, by presenting any necessary document from which it is apparent that such data need to be completed or corrected (right to rectification), which is also an obligation of the latter.
c) to request the restriction of the processing of his/her data (right to restriction of processing).
d) to refuse and/or oppose any further processing of personal data held by the Company (right to objection).
e) to request the erasure of data from the Company's records (right to be forgotten).
f) to request that the Company transfers the data he/she has provided to it, to any other controller (right to data portability).

It is noted that the fulfillment of the requests under points (c), (d) and (e), if they relate to data that are necessary for the conclusion or continuation and performance of the contract, regardless of whether they were granted by the Client or obtained from any public source, implies the automatic termination of the respective contract or contracts by the Client, in

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accordance with their relevant terms, or failure to examine a data subject's request. Furthermore, the Company has the right to refuse the request to restrict the processing or erasure of the Client's data, if the processing or keeping of the data is necessary for the establishment, exercise or advocacy of its legitimate interests, legal rights or compliance with its legal obligations.

According to the aforementioned.

- The exercise of the right to portability [under point (f) above] does not entail the erasure of data from the files of the Securities Firm, which is subject to the terms of the immediately preceding paragraph.
- The exercise of the above rights shall have a future effect and shall not relate to already processed data.

The Client has the right to lodge a complaint with the Hellenic Data Protection Authority (www.dpa.gr), which is the competent supervisory authority for the protection of the fundamental rights and freedoms of individuals against the processing of personal data related to these individuals, provided that it is considers that their rights are infringed in any way.

7. How you can exercise your rights

To exercise the above rights, the Client may contact:

- The Customer Service Department, in writing, at CrediaPantelakis Securities S.A. Antistaseos Street, Chalandri 152 31, Athens, Greece
- By e-mail at gdpr@pantelakis.gr and
- By telephone at 210 69 65 000.

The Company will make every effort to respond to the Client within thirty (30) days of their request being submitted. At the Company's discretion, this period may be extended for an additional sixty (60) days, taking into account the complexity of the request and the number of requests. The Company will inform the Client of any extension to the thirty-(30)-day deadline and the reasons for the extension within thirty (30) days of receiving the request. If the Company does not act on the Client's request, it shall inform the latter without delay, but no later than thirty (30) days from the receipt of the request, on the reasons it did not act on the request and the possibility of filing a complaint and filing a court appeal.

The above service is provided free of charge. However, if the Client's requests are manifestly unfounded, excessive or repetitive, the Company may either impose a reasonable fee to the

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Customer by informing him/her accordingly, or refuse to respond to such requests.

8. How are the Client's rights protected

The Company shall implement an information security management system to ensure confidentiality, security of the processing of Clients' data and their protection against accidental or unlawful destruction, loss, alteration, prohibited dissemination or access and any other form of unlawful processing.

This notice addressed to Clients is based on our Company's obligation to implement and comply with the General Regulation (EU) 2016/679 of the European Parliament and of the Council, and the other provisions of the Greek legislation on the protection of personal data which are adopted and implemented in this context and replaces any prior notice made in the context of Law 2472/1997 and which may refer to the Company's contractual or other documents.

Contact Details

(A) Data Controller

CrediCrediaPantelakis Securities S.A.

Address: 57B Ethnikis Antistaseos Street, Chalandri 152 31, Athens, Greece

Telephone number: 210 69 65 000

Email: pantelakis@pantelakis.gr

(B) Data Protection Officer

Address: 57B Ethnikis Antistaseos Street, Chalandri 152 31, Athens, Greece

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