

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA**

### **PURSUANT TO THE REGULATION (EU) 2016/679**

### **AND THE RELEVANT GREEK LEGISLATION**

Eurobank Asset Management M.F.M.C. (hereinafter referred to as the “**Company**”) informs you, pursuant to the Regulation (EU) 2016/679 and the relevant Greek legislation in force with regard to the protection of personal data, in its capacity as controller, that it processes your personal data, collected either with the submission of a subscription application for units of Undertakings for Collective Investment in Transferable Securities (hereinafter referred to as “**UCITS**”) or for the provision of services, or at a later time, including data derived from the signing and the performance of a contract/contracts with the Company, or in the framework of relations and transactions with the Company, as set out below.

#### **1. What personal data does the Company collect and from which source?**

- a) Identification data: name, father’s name, Identity Card Number, Tax Identification Number, date of birth, sex etc. The aforementioned data are collected directly from you.
- b) Contact information: postal and e-mail address, fixed and mobile telephone number etc. The data are collected directly from you.
- c) Data concerning your economic and financial situation, your profession, remuneration, etc. The said data are collected either directly from you or at your request.
- d) Data deriving from the operation of a contract(s) between you and the Company, and the use of the products you have acquired or services rendered to you.
- e) Data concerning payments (bank account numbers) for the payment of your financial obligations towards the Company, or for the payment to you of amounts from product redemption or the provision of services.
- f) Data from recorded conversations and communications (e.g. conversations over a phone or in person, electronic communications) provided you have been previously informed, in compliance with the applicable law.
- g) Data from the use of electronic or virtual products and services of the Company (e.g. IP addresses), pursuant to the specific terms governing these products and services.
- h) Image data collected from the video recording systems of the premises of the Company, within which informative signs have been placed pursuant to the applicable law.

i) Data concerning your knowledge and expertise in the investment sector regarding a specific type of product or service, as well as the risks you, or the legal person you are representing, are willing to undertake.

The data collection described above includes data collection from a third party acting on your behalf, as well as data collection from an associated with you client or potential client of the Company (natural or legal person).

Furthermore, in case you provide us with personal data of third parties you must have ensured their relative consent and have referred them to this Data Protection Information.

## **2. Why does the Company collect and process your data and for which purposes?**

The Company collects and processes your personal data:

*A. For the execution of a contract and in order to carry out the necessary pre-contractual measures upon your request.*

The processing of your data as described in Section 1 serves indicatively the following purposes:

a) Your identification and the communication with you during your pre-contractual and contractual relation with the Company, as well as during any other transaction between you and the Company.

b) The signing of a contract with you, the execution and smooth functioning of said contract and the fulfilment of the Company's obligations towards you.

c) The assessment of the suitability of products and the compatibility of services provided, as well as for the provision of information to you.

d) The communication with you, your information on the best use of the services the Company provides to you, as well as for their amelioration.

Said processing (under Section A) serves also the Company's compliance with its legal obligations (see below Section B) as well as the Company's or a third party's legal interests.

*B. For the Company's compliance with its legal obligations.*

The processing of your data as described in Section 1 serves indicatively the following purposes:

- a) The prevention and repression of money laundering and terrorist financing, as well as the prevention, detection and repression of frauds against the Company or its clients, as well as of any other illegal act.
- b) The compliance of the Company with the obligations imposed by the relevant legal, regulatory and supervisory framework in force, as well as with the decisions of any authority (public, supervisory etc.) or Courts.
- c) The protection of the Company's clients, its personnel and their property as well as the Company's facilities and property.

Said processing (under Section B) serves also the Company's or a third party's legal interests (see below Section C).

*C. For serving the Company's or third parties' legal interests.*

The processing of data under Section 1 serves purposes such as the security of the Company's information systems, its facilities and assets, the prevention and deterrence of criminal acts or frauds, the protection of the Company's legal rights and interests, your information and/or participation in promotion schemes for new products and/or services, provided that your consent was chosen as a legal basis for these actions. Prior to this processing the Company ensures that the Company's interests do not override your interests or fundamental rights and freedom imposing the protection of your data.

*D. Upon your consent.*

Where the Company has requested and received your consent, the processing of your data under Section 1 is based on this consent. In such cases you have the right to withdraw your consent at any time. However the processing based on your consent prior to your withdrawal remains unaffected.

*E. Profiling or automated decision-making.*

For the fulfilment of the abovementioned purposes especially under points 2.A.c, 2.A.d, 2.B.a as well as for promotion purposes the Company may create your profile by using your data under Section 1.

In case the Company makes a decision solely based on automated processing, including profiling, which produces legal effects concerning you or affecting you in a similar way, it will provide you with specific information and, if necessary, will ask for your consent.

### **3. Who are the recipients of your data?**

For the purposes of fulfilling its contractual and legal/regulatory obligations, of serving its legal interests as well as in cases where the Company is authorized or has received your consent, recipients of your personal data may indicatively be the following:

- a) The Company's employees who are responsible for the evaluation of your requests, the management and the function of the contract(s) with the Company, the fulfillment of the obligations arising from it/them, as well as of the relevant obligations imposed by the Law.
- b) Entities to which the Company delegates the performance of specific tasks on its behalf (Processors), which may indicatively be lawyers, law firms, notaries, bailiffs, information products and/or services providers, electronic systems and network support providers, including but not limited to online systems and platforms, companies responsible for the storage, retention, filing, management and destruction of files and data, customers or market satisfaction surveys, promotion of products and/or services etc., provided that the conditions of security and confidentiality have been met.
- c) Supervisory, independent, judicial, prosecution, public or/and any other authorities, entities or parties that are responsible for the supervision/monitoring of the Company's activities within their competence.
- d) Regarding data that refer to the acquirement of UCITs units or derive from the execution of investment transactions and the provision of investment services, Eurobank Ergasias S.A., the each time relevant depository of the UCIT or the portfolio under management, brokerage firms and generally any entity involved in providing information for the specific type of transaction and its carrying out.

### **4. Is the Company allowed to transfer your data to third countries (outside EU)?**

The Company may transfer your personal data to third countries (outside the EU zone) under the following circumstances:

- a) if the Commission decides that the third country, a territory or one or more specified sectors within that third country ensure an adequate level of protection; or
- b) if appropriate safeguards have been provided from the recipient, pursuant to the applicable law.

In the absence of the abovementioned circumstances a transfer may take place if:

- a) you (the data subject) have explicitly consented to the transfer; or

b) the transfer is necessary for the execution of a contract between you and the Company, such as for the execution of orders, in which case the necessary data will be transferred to the necessarily involved operational entities; or

c) the transfer is necessary for the establishment, exercise or defense of legal claims or interests of the Company; or

d) the Company is obliged by law or an international convention to provide the data; or

e) the Company is obliged to comply with regulations regarding the automatic exchange of data within the tax sector, as derived from the international obligations of Greece.

In order to fulfil the objectives of points d or e the Company may transfer your data to the competent national authorities so that the data are delivered to the respective authorities of third countries.

## **5. For how long will the Company keep your personal data stored?**

In case you sign a contract with the Company, your personal data will be stored for as long as the contract stands. In case of contract termination the Company may store your data until the expiration of the limitation period for legal actions, as defined by law, and more precisely for up to twenty (20) years after the termination of the contract by any means.

If during said period legal actions are taken and the Company or any other Group entity is involved and you are directly or indirectly concerned, the abovementioned storage period will be prolonged until an irreversible judicial decision has been issued.

In case you do not sign a contract with the Company your data will be stored for up to five (5) years of the rejection of your application.

In case a shorter or longer storage period is foreseen by the law or regulatory acts the storage period of your personal data will be amended accordingly.

Documents that have your signature and contain your personal data may be stored electronically/digitally after a period of five (5) years has passed.

## **6. What are your rights regarding the protection of your personal data?**

You have the following rights:

a) To know the categories of your personal data that we store and process, where they come from, the purposes of their processing, the categories of their recipients, the period of storage as well as your relevant rights (right of access).

b) To demand the rectification or/and to have your incomplete data completed so that they are accurate (right to rectification) by providing supplementary statements that justify the need for rectification.

c) To ask for a restriction of the processing of your personal data (right to restriction of processing).

d) To object to any further processing of your stored personal data (right to object).

e) To request the erasure of your personal data from the Company's records (right to erasure).

f) To ask the transfer of your data stored by the Company to another controller (right to data portability).

Please note the following as regards your rights:

i. Your rights as explained above (points c, d and e) may be partly or fully not satisfied if they refer to data that are deemed necessary for the execution or the function of a contract regardless of their source.

ii. The Company has in any case the right to deny your request for restriction of processing or erasure of your data if their processing or storage is necessary for the establishment, exercise or defense of the Company's rights or the fulfilment of its obligations

iii. The right to data portability (point f) does not include the erasure of your data. The erasure is regulated under point e.

iv. The exercise of these rights is valid for the future and does not affect previous data processing.

g) To lodge a complaint to the Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)) in case you consider that your rights are in any way violated.

## **7. How can you exercise your rights?**

For the exercise of your rights you may contact the Company in writing (10 Stadiou str.,10564, Athens) or by sending an email to [am@eurobank.gr](mailto:am@eurobank.gr).

The Company shall use its best endeavors to address your request within thirty (30) days of its submission. The abovementioned period may be prolonged for sixty (60) more days, if deemed necessary according to the Company's judgment, taking into account the complexity of the issue and the number of the requests. The Company shall inform you within thirty (30) days in any case of prolongation of the abovementioned period.

The abovementioned service is provided by the Company free of charge. However, in case the requests manifestly lack of foundation and/or are repeated and excessive, the Company may, after informing the client, impose a reasonable fee or refuse to address his/her requests.

## **8. Data Protection Officer**

You may contact the Data Protection Officer of the Company for any matter regarding the processing of your personal data at the address 10 Stadiou Str. 105 64, Athens or by sending an email to [dpo-am@eurobank.gr](mailto:dpo-am@eurobank.gr)

## **9. How does the Company protect your personal data?**

The Company takes appropriate technical and organizational measures to ensure the safety and confidentiality of your personal data, their processing and protection from accidental or unlawful destruction, loss, alteration, prohibited transmission, dissemination or access and any other form of unlawful processing.

This Data Protection Information replaces as of 25.05.2018 (which is the effective date of the Regulation (EU) 2016/679 on personal data protection) any other previous general information regarding the processing of your personal data by the Company.

You can also find the present document on the Company's website ([www.eurobankam.gr](http://www.eurobankam.gr)).