

**INFORMATION ON THE PROCESSING OF PERSONAL DATA  
THROUGH A CCTV SYSTEM OPERATING IN THE OFFICES OF THE COMPANY  
EUROBANK ASSET MANAGEMENT M.F.M.C.**

The company Eurobank Asset Management M.F.M.C. (hereinafter the “**Company**”) informs you herewith, in its capacity as controller pursuant to the Regulation (EU) 2016/679 (GDPR), Greek Law 4624/2019, and other relevant Greek legislation in force with regard to the protection of personal data, regarding the video surveillance system operating in the offices of the Company (hereinafter the “**Offices**”) and notifies you regarding the type of personal data it collects, the purpose of their collection and processing, the storage period of the data, and your rights as subjects of the data. The Company informs you that in the premises that are under surveillance a clearly visible special warning sign has been placed that provides information on a first layer to the subjects of the data regarding the processing of their data through the CCTV system, and this document provides the second layer information to said subjects.

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

The Company collects exclusively the necessary image data (with no sound), from the cameras of the video surveillance system, which are in service in certain check points crucial to the supervision of its Offices, namely the entrance/exit of the Offices, and also to certain hallways leading to specific rooms inside the Offices that are important for security matters (such as the rooms where important central electronic or other facilities are installed, hereinafter the “special rooms”). The Company adjusts the cameras in such a way that only footage of the entrance/exit of the Offices, as well as the hallways leading to the special rooms that are important for securities matters, is recorded, making sure that the cameras do not focus on places where the private life of the subjects would be excessively limited, including their right to the privacy of their personal data.

The data that are collected as per above are kept by the Company for a limited period of time (see below under 4).

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

The Company collects and keeps the as per above personal data concerning your image for the purpose of protecting its premises and the assets therein from illegal acts, for the protection of your safety, as well as of the life, physical integrity, health and property of the persons inside the Company’s Offices, based on the legal ground of the legitimate interest of the Company and/or of a third party (Article 6 (1) (f) of the GDPR), as said interests are specified immediately here above.

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

Recipients of your personal data collected as per above under 1 are the competent employees of the Company within the framework of their duties, which include the care for the safety of the Offices and the persons and assets therein. The personal data of your image may be accessed by a specifically authorized employee of the Company as well as processors that monitor, maintain and/or operate on behalf of the Company the video surveillance system operating in its Offices (e.g., private security services company). In case of a need to comply with a legal/regulatory obligation, in case of an illegal act, or if the need to defend the legitimate interests of the Company or a third party (e.g., for the establishment, exercise or support of legal claims or the proof of an indictable action) recipients of your data may be, indicatively, lawyers, law firms, bailiffs, experts, engineers, valuers, supervisory, independent, judicial, prosecution, police, public and any other authorities or bodies, the person depicted as the perpetrator or the victim of an indictable action, when the data concerned may be evidential material of said action.

### **4. For how long will the Company maintain your personal data?**

Your personal data are kept for a period of eight (8) days, and for a maximum period of ten (10) days. After the lapse of eight days (or under certain special circumstances ten) as of the recording date, the relevant file is deleted. If during said time span incidents of an illegal act are recorded (e.g., fraud), the relevant sections of the data of the surveillance footage may be maintained in a separate file protected with suitable security measures, for as long as necessary for the investigation and the disciplinary or judicial action against said incidents.

### **5. What are your rights regarding the protection of your personal data and how can you exercise them?**

You have the following rights:

- (a) To demand to know the categories of your personal data that we collect, store and process, where they came 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 ask for a restriction of the processing of your personal data (right to restriction of processing).
- (c) To object to any further processing of your personal data (right to object).
- (d) To obtain the erasure of your personal data from the records that we keep (right to erasure).
- (e) Right to complain to the Data Protection Authority: You have the right to lodge a complaint with the Hellenic Data Protection Authority (Kifissias 1-3, PC 115 23, Athens, telephone number 30 210 6475600) in case you consider that your rights are in any way violated. For the Authority's competence as well as the way to lodge a

complaint you can find detailed information if you visit its website ([www.dpa.gr](http://www.dpa.gr) – Individuals – Complaint to the Hellenic DPA).

Please note indicatively the following regarding your as per above rights:

- i. The Company has in any case the right to deny your request for restriction of data processing or data erasure if their processing or storage is necessary for the establishment, exercise or defense of the Company's legitimate rights or for the fulfillment of its obligations.
- ii. The exercise of the aforementioned rights is valid for the future and does not affect any previous data processing.
- iii. The Company has the right to request from you further information which are necessary for the verification of your identity.
- iv. For the consideration of a request relevant with your image, you should specify in your request the place, date and time (at least approximately) that you were in the range of the video surveillance system, and to provide a recent image, in order to make easier to find your data and to conceal the data of third parties depicted in the footage. As an alternative, you are provided with the choice to visit the site the Company specifies so that the images in which you are depicted are displayed.

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

For the exercise of your rights, you may contact the Company in writing, at 10, Stadiou Str, 105 64 Athens, or via e-mail at [am@eurobank.gr](mailto:am@eurobank.gr).

The Company shall use its best endeavors to address your request within thirty (30) days of its receipt. The abovementioned period may be prolonged for sixty (60) more days, if deemed necessary, at the Company's absolute discretion taking into consideration the complexity of the issue and the number of the requests. The Company shall inform you within thirty (30) days of the request's receipt 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 foundation and/or are excessive and repeated, the Company may, after informing you, impose a reasonable fee or refuse to address your requests.

#### **7. Transfer of the Data outside the European Economic Area (E.E.A.)**

The Company as a rule does not transfer the above under 1 mentioned personal data to third countries or international organizations outside the European Economic Area. Exceptionally, in case it is necessary for the Company to go forward with such a transfer, the latter shall be subject to the rules, provisions and guaranties set by articles 44-49 of the GDPR.



Asset Management  
MFMC

eurobankam.gr

EUROBANK ASSET MANAGEMENT  
MUTUAL FUND MANAGEMENT COMPANY  
SINGLE MEMBER SOCIÉTÉ ANONYME

10 Stadiou Str., GR 105 64 Athens

G.C.R. 002292401000

## 8. Data Protection Officer

You may contact the Company's Data Protection Officer for any matter regarding the processing of your personal data at the address 10 Stadiou Str. 10564, 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 implements appropriate organizational and technical measures to ensure the security and confidentiality of your personal data and their processing, and the protection of your data from accidental or unlawful destruction, loss, alteration, prohibited transmission, dissemination or access and any other form of unlawful processing.

This Data Protection Information is at all times posted and updated on the Company's website ([www.eurobankam.gr](http://www.eurobankam.gr)), is accessible through a QR code at the entrance of its Offices and is also available in printed form at the reception of the Offices.