

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE BOARD OF DIRECTORS' MEMBERS OF "EUROBANK ASSET MANAGEMENT MUTUAL FUND MANAGEMENT COMPANY SINGLE MEMBER SOCIETE ANONYME" PURSUANT TO REGULATION (EU) 2016/679 AND THE RELEVANT GREEK AND EUROPEAN UNION LEGISLATION

With the present document we would like to inform you on the processing of your personal data by the company "**Eurobank Asset Management Mutual Fund Management Company Single Member Société Anonyme**", having its registered office in 10 Stadiou str. 10564, registered at the General Commercial Registry with GCR No **2292401000** (hereinafter referred to as the "**Company**"), that acts in this particular case as data controller, pursuant to Regulation (EU) 2016/679 (hereinafter referred to as the "**Regulation**"), Law 4624/2019 and further provisions of the relevant Greek and EU legislation on personal data protection. The term "you" for the purposes of this Information refers, indicatively, to the Company's Board of Directors' members or candidate members, as well as third persons related to the above, such as spouses/ partners/ registered partners, relatives of the aforementioned persons or financially dependent persons, persons with close links with them, as these links are in each case defined by the relevant legal and regulatory framework, their assistants etc. in case their personal data are processed for the purposes described in this Information. Notices that are more specific may supplement this Information.

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

The necessary personal data that the Company collects may indicatively be the following and not all of them necessarily concern you.

- a. Identification data: name and surname, father's name, mother's name, Identity Card number/Passport number, Tax Identification Number, date and place of birth, citizenship, gender, photograph, electronic identification data such as user name, signature data etc..
- b. Contact information: postal address/ residence data (permanent as well as current residency and relevant documentation), e-mail address, telephone number (fixed and mobile), etc.
- c. Profession and data regarding your professional skills, such as indicatively CV data, data included in questionnaires you fill in, or data from interviews you participate into, data included in documents you provide the Company with, such as education certificates and licenses, professional certificates, referrals and communication data of the persons you appoint for referrals or for the confirmation of these referrals by third persons, data regarding your participation in unions, as well as data regarding your professional experience and activity (participation in boards of directors/ committees, exercise of managing duties or control to other entities except for the Company).
- d. Data regarding your family status and data regarding dependents, to the extent these data are necessary for the fulfillment of obligations arising from the law, policies, etc.
- e. Family relationships (including spouses/ partners/ ex-spouses/ fiancés /god-parenthood) with employees of the Company and/or other companies of the group (hereinafter referred to as the "Group"; it is explicitly clarified that the Group consists of companies of the group of "Eurobank Ergasias Services and Holdings S.A." including "Eurobank S.A." and its group companies).

- f. Criminal record data or solemn declaration on the non-existence of certain criminal convictions, as provided for by the relevant legal and regulatory framework in force.
- g. Financial status data as provided for by the legal and regulatory framework or/and policies.
- h. Data in order to ensure the non-existence of conflict of interest (indicatively data regarding business activity with the Company or/and the Group companies, any disputes with the Company or/and the Group companies, professional, trade or client relationship or financial interest with the Company or/and the Group companies, any substantial financial obligations towards the Company or/and Group companies, as provided for by the relevant legal and regulatory framework or/and policies etc.).
- i. Data deriving throughout the period you are a member of the Company's Board of Directors, such as indicatively communication/correspondence with the Company or third parties within the framework of your duties/competences, your position/ capacity/ responsibilities/ participation in committees/ mandate/ education, data required for payments (such as bank account number), data regarding benefits, expenses, data regarding access to the premises, to the records as well as to any other electronic equipment of the Company etc..
- j. Data collected by closed circuit television systems in the Company's premises.
- k. Image data indicatively from the Company's or the Group's events.
- l. Special categories data (indicatively health data) provided the legal conditions have been met.

The Company collects the aforementioned data either directly from you or from third persons acting on your behalf (such as proxies, representatives) or persons related with you or from its own records (for example data deriving from your appointment as members of the Company's Board of Directors, from communication media, data from information systems, systems recording your access and image data etc.) or data collected by companies providing teleconference services. Moreover, the aforementioned data may be collected or verified by Group companies or third persons providing or confirming your referrals.

According to the Regulation, the personal data must be updated and accurate. Consequently, you are obliged to inform the Company for any change on the aforementioned personal data that you have transferred to it.

In case you provide us with personal data of third persons, you must have in advance properly informed them referred them to the preset document, and have ensured their consent, where necessary.

2. For which purposes does the Company collect your personal data and under what legal bases does it process them?

The Company processes your personal data required each time. In view of the below mentioned processing purposes in case you deny to provide the necessary personal data and/or to update your data, the Company will not be able to fulfill its relevant obligations

(legal or contractual etc.). The Company processes additionally special categories of personal data as defined in art. 9 of the Regulation according to the provisions of the Regulation and the relevant legislation.

A. To service your relationship as a member of the Board of Directors (article 6 para 1b of the Regulation)

Said processing of the data described under section 1 above serves purposes such as:

- a. Your identification.
- b. The communication with you.
- c. The evaluation of your candidature for your appointment as member of the Company's Board of Directors.
- d. The setting out or/and evaluation of your competencies, duties, obligations as members of the Company's Board of Directors.
- e. The exercise of your rights and the fulfillment of your obligations as Board of Directors' members and the exercise of the Company's rights and fulfillment of its obligations (i.e. payments) as well as the provision of benefits.
- f. The transfer of your data to third parties to the extent necessary in the framework of the Company's management and representation and the exercise of your duties as Board of Directors' members in general.
- g. The promotion of the Company's corporate profile.

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

B. To comply with its legal obligations (article 6 para 1c of the Regulation)

The processing of the data described under section 1 above serves purposes such as:

- a) The Company's compliance with obligations imposed by the relevant legal, regulatory, and supervisory framework, international agreements as well as with decisions of authorities (public, supervisory, independent, prosecution etc.) or courts (regular or arbitrary).
- b) The protection of persons and property.

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

C. To protect the Company's or a third party's (such as indicatively Group companies, cooperating companies etc.) legal interests (article 6 para 1f of the Regulation)

Additionally, the processing of the personal data described under section 1 above serves purposes, such as indicatively the establishment, exercise and defense of legal claims, the compliance with the Company's policies, the compliance with the terms of the Company's contracts with third parties, the security and safety of the Company's information systems, the Company's or third parties' facilities and assets in general, maintaining the Company's records, its reputation, the deterrence of criminal acts or frauds against the Company or a third party, etc.

D. Upon your consent (article 6 para 1a of the Regulation)

In case we have asked and received your consent, especially when the processing cannot be established on any of the abovementioned (2.A. – 2.C.) legal bases, the processing of your data under section 1 is based on your consent (see indicatively the below mentioned case regarding the data transfer outside the EEA under point 4.c.i.). In such cases, you have the right to withdraw your consent at any time. Please see below under section 7 how you can withdraw your consent; where relevant, we will also inform you on specific ways to withdraw your consent depending on the way you consented. The processing based on your consent prior to its withdrawal remains unaffected.

E. Automated decision-making including profiling

The Company does not carry out solely automated individual decision-making. In case the Company decides in the future to carry out automated individual decision-making, including profiling, that produces legal effects or significantly affects you in a similar way, you will be provided with a specific notice and, where required, you will be asked for your consent.

3. Who are the recipients of your data?

Recipients of your data may indicatively be the following:

- a. The Company's competent employees, members of the Company's administration/committees within the framework of their duties.
- b. Lawyers, law firms, bailiffs, notaries, experts, chartered accountants/auditors, and consulting services providers (such as indicatively financial consultants, Board of Directors' evaluating companies etc.).
- c. Companies responsible for storage, filing, management and destruction of files, records and data, information application and services providers, teleconference services providers, telecommunication services providers, cloud services providers, information society services providers and mail services providers.
- d. The General Commercial Registry, a publicly accessible registry, where data such as appointment acts or cease of a member, the representation power are published, as provided for by the legal framework.
- e. Your picture as well as data from your CV as members of the Board of Directors are also available on the Company's website and are accessible to its visitors.
- f. Supervisory, independent, judicial, prosecution, police, tax, public or/and any other authorities (such as the Hellenic Capital Market Commission, the Bank of Greece, etc.), authorized mediators and mediation centers, arbitration tribunals and alternative dispute resolution entities.
- g. The General Meeting of the Company's shareholders.
- h. Third parties, such as indicatively clients or partners or mass media, when it is necessary for communication purposes, the management of relations, the fulfillment of the

Company's contractual obligations, the execution of transactions and the promotion of the corporate profile in the framework of the duties you have been assigned with as Board of Directors' members.

- i. Cooperating companies for the provision of services/ benefits to you as Board of Directors Members (indicatively entities providing educational services/ e-learning services, hotels, travel agencies, airline companies etc.).
- j. Insurance bodies and insurance companies.
- k. Any third persons that submit a request to the Company in order to receive information, pursuant to the law.

For the personal data processing of the abovementioned recipients that act as data controllers, we advise you to consult their personal data notices.

4. Is the Company entitled to transfer your data to third countries (outside the EEA)?

The Company may transfer your personal data to third countries or international organizations outside the European Economic Area (EEA) under the following circumstances:

- a) if the Commission decides that the third country, territory or one or more specified sectors within that third country or an international organization ensures an adequate level of protection; or
- b) if appropriate safeguards for data processing have been provided, according to EU and/or national legislation.
- c) In the absence of the abovementioned circumstances, a transfer may take place if a derogation as provided for in by the relevant EU and/or national legislation is met, including indicatively the following:
 - i. You have explicitly provided your consent to the Company; or
 - ii. Within the framework of the Company's compliance with obligations imposed by the legislation or international agreements and to the extent that the transfer is necessary for important reasons of public interest; or
 - iii. The transfer is necessary for the establishment, exercise or defense of legal claims.

5. For how long will the Company store your personal data?

Your personal data will be kept for the time necessary for the fulfillment of their processing purpose, otherwise for the time required by relevant the legal and/or regulatory framework or/and the Company's policies or for the time required for the exercise of claims or defense of rights and legitimate interests.

Additionally, few necessary data of yours as members of the Board of Directors (indicatively your name, role, term etc.) may be part of the Company's records and will be kept during the entire period said record exists.

6. What are your rights with regard to the protection of your personal data?

You have the following rights to the extent they can be implemented:

- a. To demand 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, their storage period as well as your relevant rights (right of access).
- b. To demand the rectification or/and amendment to your data so that they are complete and accurate (right to rectification) by providing any necessary document justifying 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 demand the erasure of your personal data from the records we keep (right to erasure), under certain circumstances, such as in cases the data are no longer necessary, you have withdrawn your consent or your data have been unlawfully processed etc..
- f. To ask for the transfer of your data kept by the Company to any other controller (right to data portability).
- g. To withdraw your consent at any time. The legality of the processing based on your consent before its withdrawal remains unaffected and you can consent again to the processing.
- h. **Right to complain to the Data Protection Authority:** You have the right to lodge a complaint with the Hellenic Data Protection authority 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 on its website (www.dpa.gr – Citizen Rights – Complaint to the Hellenic DPA).

Please note the following as regards your abovementioned rights:

- The Company preserves in any case the right to deny your request for restriction of processing of your personal data or their deletion, in case their processing or storage is necessary for the exercise of your rights or the fulfillment of the Company's obligations towards you, as well as for the establishment, exercise of defense of the Company's rights or its compliance with its legal obligations.
- The Company has also the right to deny your request for data erasure to the extent that some of these data are not erased but kept for its records as described under point 2.C. above.
- The exercise of these rights is valid for the future and does not affect any previous data processing.

7. How can you exercise your rights under 6 above?

For the exercise of your rights described in the previous section, explicitly including your right to withdraw any given consent, you may contact in writing 10 Stadiou str., 10564, Athens or by sending an email to am@eurobank.gr

The Company will 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 of foundation and/or are excessive and repeated, the Company may, after informing you, impose a reasonable fee or refuse to address your request(s).

8. Data Protection Officer

You may contact the 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

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 protection from accidental or unlawful destruction, loss, alteration, prohibited transmission, dissemination or access and any other form of unlawful processing.

10. Amendments of this Information

The Company may amend the present Information. In such case, the date of the update will be mentioned at the end of the Information and you will be notified accordingly via a posting on its website <http://www.eurobankam.gr>

The present Information was amended on March 20, 2020 and is available online and updated at the Company's website <http://www.eurobankam.gr> and in printed format by the Corporate Governance Unit.