Data Protection Policy for Telephone Customer Service (Call Center)

Controller

The company under the name "BANKING INFORMATION SYSTEMS S.A." and the distinctive title "TIRESIAS S.A." (hereinafter "TIRESIAS"), with registered office in Marousi, Attica, at 2 Alamanas Street, P.C. 15125, tel. +30 2103676700, processes personal data of callers and persons called in the course of operating a telephone customer service centre.

This Data Protection Policy for Telephone Customer Service (Call Center) (hereinafter the "Policy") concerns the terms and conditions governing the processing of your personal data by TIRESIAS, in accordance with Regulation (EU) 2016/679, the General Data Protection Regulation (hereinafter also the "GDPR"), when you communicate with the TIRESIAS call centre.

In particular, we provide information on the categories of personal data we collect, how and for what purposes we collect them, the third parties with whom we share these data, your rights and the security measures applied by TIRESIAS.

This Policy is subject to periodic amendments and updates in order to remain aligned with the regulatory framework in force from time to time.

General Processing Principles

Your personal data is collected in a fair and lawful manner and, where required, with your consent, for a specified, explicit and lawful purpose, and is processed fairly and lawfully within the framework of that purpose.

The personal data collected is relevant to the purposes of processing, appropriate and not more than is required for each processing purpose.

The correctness and accuracy of your personal data are ensured in accordance with the procedures established for these purposes, and the data are retained in a form permitting your identification for the period required to fulfil the purposes of processing.

In addition, adequate security measures are applied to protect your personal data and prevent risks such as loss, unauthorised access, destruction, unlawful use or disclosure.

How we collect your personal data

Your personal data is collected during the telephone call.

What categories of personal data we collect

During telephone calls, we collect the following categories of personal data, depending on the content and requirements of each request:

- Identification data, such as full name and father's name.
- Contact data, such as telephone number and e-mail address.
- Communication metadata, such as the date, time and duration of the call.
- Information you provide during the conversation for the handling of your request.
- User data (e.g. registration e-mail address and other information relating to questionnaires on the ESGr platform).

Furthermore, after informing you accordingly and obtaining your prior consent, we collect:

- The audio file of the call / recorded content of the call.

Purposes for which we process your personal data

- Providing information about procedures, required supporting documents and the exercise of your rights under the GDPR.
- Managing and resolving enquiries or support requests in connection with the provision of our services (e.g. enquiries from ESGr platform users).
- Diagnosing, addressing and resolving technical issues relating to the operation of our services.
- Quality assurance and staff training to optimise the customer service experience provided.
- Providing evidence that a call took place and of the content of the request and conversation, where it has legal or other consequences for you and/or TIRESIAS.
- Conducting satisfaction surveys.

Legal bases of processing

We process your personal data on the following legal bases:

- On the basis of TIRESIAS' legitimate interest in providing you with effective service and support, ensuring proper management of your requests, identifying you (where required) and providing evidence of the content of the conversation.
- On the basis of a legal obligation to facilitate your exercise of rights under the GDPR.
- For the performance of the contract between us (e.g. banking users, ESGr platform users).
- On the basis of your prior consent to the recording of your call by the external call centre service provider. In particular, before recording of the telephone conversation begins, you are provided with clear and complete information about the recording and

its purpose. Your consent is given by a clear affirmative action (through express acceptance). You retain the right to withdraw your consent at any time, without affecting the lawfulness of processing based on that consent before its withdrawal.
If you do not give your consent, the conversation will not be recorded, while the handling of your request will continue as normal.

- On the basis of your prior consent to participate in a customer satisfaction survey for the purpose of statistical analysis to improve the services we provide. Participation in satisfaction surveys is optional and your responses are anonymised.

To whom we disclose your personal data

Recipients of your personal data are only those TIRESIAS staff members for whom access is strictly necessary, who have been specifically authorised and are bound by confidentiality obligations. To fulfil the above purposes effectively, TIRESIAS cooperates with an external call centre service provider, which processes your data as a Processor exclusively on our instructions and on our behalf. Where TIRESIAS entrusts the processing of personal data to third parties acting on its instructions and on its behalf, those parties must fully comply with TIRESIAS' instructions. Such compliance is ensured through specific provisions in the relevant outsourcing contracts and the observance of corresponding procedures, in accordance with Article 28 GDPR.

Finally, we may share or disclose your personal data where required by law. Recipients of your personal data may include Supervisory, Judicial, Independent and other Authorities at national and European level, for the fulfilment of an obligation of TIRESIAS under a law, regulatory provision or court decision.

Where your personal data is processed

Your data is processed exclusively on infrastructure located in Greece.

Processing principles and protection measures

TIRESIAS, indicatively and without limitation:

- processes only your personal data that is necessary for the above purposes and only for those purposes;
- takes appropriate technical and organisational measures for the security of personal data (ensuring confidentiality, integrity and availability) by design and by default;
- has ensured that the external call centre service provider is bound by appropriate contractual terms, including terms concerning confidentiality, processing security, compliance with applicable personal data protection legislation and processing exclusively on TIRESIAS' instructions;
- has and applies procedures and systems for the confidentiality of personal-data processing and for protection against accidental or unlawful destruction, accidental

loss, alteration, unauthorised disclosure or access and any other form of unlawful processing (e.g. use of access-control and data-loss-prevention tools);
- has informed data subjects in accordance with Regulation (EU) 2016/679 (GDPR);
- observes the principle of personal data minimisation, retaining your data only for the period strictly necessary for the purposes of processing;
- takes care of the exercise and satisfaction of data subjects' rights;
- has prepared appropriate policies and procedures demonstrating its compliance, in accordance with the accountability principle;
- has appointed a Data Protection Officer and established a team for personal-data protection;
- trains and raises awareness among employees regarding personal-data protection;
- has concluded cooperation agreements with processors acting on its behalf, in accordance with Article 28 GDPR, with a view to ensuring their full compliance.

TIRESIAS ensures, to the extent of its obligations as Controller, that the external call centre service provider acting on its behalf likewise applies appropriate technical and organisational measures for the secure processing of personal data.

How long we keep your personal data

Your personal data collected through the call centre is retained by TIRESIAS for a period of 12 months.

What your rights are and how you may exercise them

You have the following rights under the GDPR:

i. Right to information
TIRESIAS must inform you about the processing to which it subjects your personal data, including, indicatively, which data it processes, for what purpose and for how long it keeps them, in a transparent, intelligible and easily accessible form, using clear and plain language.

ii. Right of access
You have the right to obtain confirmation from TIRESIAS as to whether or not personal data concerning you is being processed and, where this is the case, you have the right of access to such data. You also have the right of access to recordings of calls concerning you.

iii. Right to rectification
You have the right to request rectification of any inaccurate personal data and completion of any incomplete data, by providing any document necessary for this purpose.

iv. Right to erasure

You have the right to request erasure of personal data, by providing any document necessary for this purpose, provided that specific conditions are met.

v. Right to restriction of processing
You have the right to secure restriction of processing, provided that specific conditions are met.

vi. Right to object
You have the right to object, at any time, to the processing of personal data concerning you.

vii. Withdrawal of consent
You have the right to withdraw your consent at any time where the processing being carried out is based on it. In such case, TIRESIAS will stop the processing, without affecting the lawfulness of processing based on that consent before its withdrawal.

viii. Right to portability
You have the right to request that we transfer the personal data we hold to any other controller of your choice, provided that specific conditions are met. Exercise of the right to portability does not entail deletion of your data from TIRESIAS' files.

TIRESIAS is in any event entitled to refuse satisfaction of your request for restriction of processing or erasure of your personal data or your objection to processing if processing or retention of the data is necessary for the establishment, exercise or defence of its legal rights or for fulfilment of its obligations.

Exercise of the above rights operates for the future and does not concern data processing already carried out.

ix. Right to lodge a complaint with the Authority
You have the right to lodge a complaint if you consider that your rights have been infringed in any way, through the dedicated online portal of the Hellenic Data Protection Authority at www.dpa.gr (1–3 Kifisias Avenue, Athens, P.C. 115 23 | tel.: +30 210 6475600). Detailed instructions for lodging a complaint are provided on the Authority's website.

To exercise the above rights, you may visit the TIRESIAS website at www.tiresias.gr, contact us by e-mail at customerservice@tiresias.gr, by telephone at +30 210 3676700 or in writing at TIRESIAS' postal address (2 Alamanas Street, P.C. 151 25, Marousi, Attica). In addition, TIRESIAS has appointed a Data Protection Officer in accordance with Article 37 GDPR, whom you may contact at dpo@tiresias.gr.

When do we respond to your requests?
We respond to your requests free of charge, without delay and in any event within one (1) month from receipt of your request. If, however, your request cannot be answered in time,

we will inform you within the month if we need an extension of another two (2) months, within which we will respond to you.

If your requests are manifestly unfounded or excessive, in particular because of their repetitive character, TIRESIAS may charge a reasonable fee, taking into account the administrative costs of providing the information or taking the requested action, or may refuse to act on the request.

If your requests, in whole or in part, cannot be satisfied by TIRESIAS, we must inform you within the prescribed time limit, in detail, clearly and with reasons, of the precise reasons for rejection or for not taking action on your request.

What law applies to the processing of your personal data by us?

We process your data in accordance with the General Data Protection Regulation 2016/679/EU and, in general, the applicable national and European legislative and regulatory framework for the protection of personal data (Law 4624/2019, Law 3471/2006).

This Policy may be amended at any time without prior individual notice to you. The current version is always available at https://www.tiresias.gr/en/personal-data-processing/ .