

Newsletter Service Personal Data Protection Policy

Data Controller

The company styled "Banking Information Systems SA" with the distinctive title "Tiresias SA" (hereinafter referred to as the Company"), having its registered office in Maroussi, Attica, 2 Alamanas Street, PC 15125, tel.: 2103676700, e-mail: tiresias@tiresias.gr processes the personal data of users who subscribe to TEIRESIAS newsletter service.

This policy, hereinafter referred to as the "Policy", concerns the conditions for the collection, storage and use of your personal information by the Company, after and during your subscription to the service through tiresias.gr, teiresias.gr and business.tiresias.gr as may be changed/updated from time to time.

Subscription to the service is governed by the [Terms of Use](#).

General Principles of Processing

The collection of the user's personal data is carried out in a fair and lawful manner, where his/her consent/approval is required for a specific, clear, and lawful purpose with fair and lawful processing. Within the framework of each purpose, the data collected are relevant to the processing purpose, appropriate, and not more than what is necessary for the respective processing purpose. The user's data is checked for accuracy and is regularly updated and revised, in accordance with the procedures established for this purpose, and is maintained in a form that allows the identification of their identity for the required period, within the framework of fulfilling the purpose of processing.

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

When do we collect your personal data

Your data is collected when you subscribe to the Newsletter service on one or all our websites.

What categories of personal data we collect

We use your email address in order to send you Newsletters from the respective websites where you have registered for that specific service.

Once you register for the corresponding Newsletter – unless you are already our customer and had not initially expressed your objection – you will receive a confirmation message, and thereafter you will continue to receive the electronic newsletters until you unsubscribe.

To send a Newsletter, we collect your date and time of subscription in addition to your email address.

We use tracking pixels to create statistical data to measure the effectiveness of our communication campaigns and improve the content of our newsletters. Through these technologies, information is collected regarding whether an email was opened, when it was opened, and whether links contained in the newsletter were clicked. The processing is carried

out based on your consent, which you can withdraw at any time, without affecting the lawfulness of processing based on consent before its withdrawal. Under no circumstances are these data used for profiling or for targeting users through other communication channels.

Purpose of processing your personal data

We process your personal data for the purpose of sending Newsletters providing news and information about the Company, its activities, updates on the new services of business.tiresias.gr as well as the online application TSEK, current promotional actions, various news about the services offered through the TSEK platform, or news of general economic or business content, and other related topics.

Legal bases of processing

We process the above personal data on the basis of your prior consent, except in cases where you are already our customer and had not initially expressed your objection.

Registration for the service and the granting of the required consent take place after reviewing the relevant Terms of Use of the service and this Policy in the “Newsletter Registration” field of the respective website, where you are given the option to enter your email in order to receive an informational newsletter from the Company.

Specifically:

I. Regarding your registration for the Newsletter service of the websites tiresias.gr and teiresias.gr, you enter your email in the corresponding field while also clicking on the link “I consent to receiving Newsletters from Tiresias S.A. in accordance with the relevant Terms of Use and the Privacy Policy,” which includes links to the Terms of Use and the Policy.

You subsequently receive an email, in which you are asked to confirm that you consent to receive Newsletters from the Company and wish to subscribe to the relevant service. Once you accept, you are added to the list of registered Newsletter subscribers, which is automatically stored in the relevant system.

II. Regarding your registration for the Newsletter service of the website business.tiresias.gr, you enter your email in the corresponding field while also clicking on the link “I consent to receiving Newsletters from Tiresias S.A. in accordance with the relevant Terms of Use and the Privacy Policy,” which includes links to the Terms of Use and the Policy.

You may at any time inform us that you wish to stop receiving Newsletters from TIRESIAS by using the unsubscribe option included in every newsletter you receive.

Additionally, via email correspondence at the address: Tiresias@tiresias.gr (regarding the newsletter of the tiresias.gr, teiresias.gr websites) and at the email: tsekinfo@tiresias.gr (regarding the newsletter of the website business.tiresias.gr) or by any other appropriate means.

You maintain the option to re-subscribe at any time.

To whom we disclose your personal data

Recipients of the Data are the absolutely necessary personnel of the Company, who are bound by confidentiality, as well as the businesses cooperating with us, which process your Data as Processors on our behalf and in accordance with our instructions, such as companies providing automated electronic mail distribution services, etc. It is noted that in cases where TIRESIAS assigns the processing of personal data to third parties acting under its instructions and on its behalf, they are required to fully comply with TIRESIAS's directives. Such compliance is ensured through specific provisions in the relevant outsourcing contractual texts and the observance of corresponding procedures.

We may share or disclose your Data when required by law. Recipients of your data may include Supervisory, Judicial, Independent, and other Authorities at the national and European level, for the fulfillment of TIRESIAS's obligations under law, regulatory provision, or court decision.

We do not transfer your Data outside the European Economic Area (EEA).

Processing principles and protection measures

TIRESIAS, indicatively and not exhaustively:

- processes only your personal data that are necessary for the aforementioned purposes, and solely for those purposes;
- implements appropriate technical and organizational measures for the security of personal data (ensuring confidentiality, integrity, and availability) by design and by default;
- establishes and implements procedures and systems for the confidentiality of personal data processing, as well as for their protection against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access, and any other form of unlawful processing (e.g., use of tools for access controls and data loss prevention);
- has informed the data subjects (citizens and employees), in accordance with Regulation (EU) 2016/679 (GDPR).
- observes the principle of personal data minimization;
- ensures the exercise and fulfilment of the rights of the data subjects;
- has prepared the documents, policies, and procedures that demonstrate its compliance, in accordance with the principle of accountability (Privacy Policy, Cookies Policy, recording of the type, categories, and flows of personal data, drafting of processing records, impact assessment, etc.) as specified in the GDPR;
- has appointed a Data Protection Officer and set up a personal data protection team;
- provides training and awareness programs for employees regarding the protection of personal data;
- concludes cooperation agreements with processors acting on its behalf, in accordance with Article 28 of the GDPR, with the aim of ensuring their full compliance as well.

How long do we keep your personal information

We keep your personal data for as long as you remain subscribed to our recipient list, and we delete it if you withdraw your consent or, if you are our customer, when you express your objection.

What are your rights and how can you exercise them?

You have the following rights:

- i. **Right to Information**
TIRESIAS is obliged to inform you about the processing of your personal data, such as, indicatively, which data it processes, for what purpose, for how long it retains them, in a transparent, comprehensible, and easily accessible form, using clear and simple wording.
- ii. **Right of Access**
You have the right to obtain from TIRESIAS confirmation as to whether or not personal data concerning you are being processed and, if so, you have the right to access those data.
- iii. **Right to Rectification**
You have the right to request the rectification of any inaccurate personal data and the completion of any incomplete data, by providing all necessary supporting documentation.
- iv. **Right to erasure**
You have the right to request the erasure of personal data, by providing all necessary supporting documentation, provided that specific conditions are met.
- v. **Right to Restriction of Processing**
You have the right to obtain restriction of processing, provided that specific conditions are met. An expression of the right to restriction of processing is also the right to request the non-transmission of data concerning you.
- 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, provided that the processing being carried out is based on that consent. In this case, TIRESIAS will cease the processing.
- viii. **Right to Data Portability**
You have the right to request that we transfer your personal data, which we maintain, to any other controller of your choice, provided that specific conditions are met. The exercise of the right to data portability does not entail the erasure of your data from the records of TIRESIAS.

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

The exercise of the above rights applies 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 with the Hellenic Data Protection Authority (www.dpa.gr), if you consider that your rights are being infringed in any way.

For the exercise of the above rights, you may contact TIRESIAS in writing at its address (Alamanas 1 Street, Marousi 151 25) or electronically at the email address tiresias@tiresias.gr, or by telephone on working days from 09:00 to 16:00 at +30 210 3676700, and in any case you may also contact the Data Protection Officer of TIRESIAS at dpo@tiresias.gr. Additionally, a Customer Service Office operates at the Company on working days from 08:30 to 14:00 (Alamanas 1 Street, 151 25 Maroussi).

When do we respond to your Requests?

We respond to your requests free of charge, without delay, and in any case within one (1) month from the time we receive your request. If, however, your Request cannot be answered in time, we will inform you accordingly within the month, should we need to obtain an extension of another two (2) months, within which we will provide you with our response.

If your Requests are manifestly unfounded or excessive, particularly due to their repetitive nature, TIRESIAS may impose the payment of a reasonable fee, taking into account the administrative costs of providing the information or carrying out 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 are obliged to inform you, within the prescribed time limit, in detail, clearly, and with justification of the precise reasons for the rejection or for the non-performance of action on your request.

What is the applicable law when we process your Data?

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).

Data Protection Officer (DPO)

TIRESIAS has appointed a Data Protection Officer in accordance with Article 37 of the General Data Protection Regulation (tel. +30 210 36.76.700, dpo@tiresias.gr, Alamanas 2 Street, 151 25 Maroussi).

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