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## DATA PROTECTION PRIVACY NOTICE

### A. INFORMATION TO THE CUSTOMER / DATA SUBJECT

The company under the name "NEXI Payments Greece SA" (hereinafter referred to as the "Company" or "NEXI"), in its capacity as Controller, shall inform, in accordance with the General Data Protection Regulation and on the free movement of such data (EU) 2016/679 of the European Union (GDPR) ) and the provisions of the Greek legislation for the protection of such data, as applicable, the natural person (hereinafter referred to as, regardless of gender or status, the "Customer") that the same and / or third parties, by order and on its behalf, process personal data relating to him or her, in the context of the contract for the acceptance of cards for the payment of the consideration for the sale of goods or services (hereinafter referred to as the "Contract") as set out below.

The Company is owned and controlled by Nexi S.p.A, headquartered at Corso Sempione 55, 20149, Milan, Italy (hereinafter referred to as the "Group").

#### I. What data do we collect\*?

- a) **Identification data**, such as name, father's name, mother's name, gender, copy of identity card (ID card) or passport, TIN, Tax Office, date and place of birth, nationality and other demographic data.
- b) **Contact details** such as postal (residential and work) and e-mail address, landline and mobile phone number.
- c) **Financial and asset status data**, including but not limited to, business activity, income, assets, items included in the income tax clearance statement and other data of tax, insurance and income nature (indicative form E1, E3, insurance clearance).
- d) **Transactional data**, from the operation of the Customer Contract with NEXI, as well as the consequence of the fulfillment of the financial obligations undertaken by it.
- e) **Financial behaviour data and in particular data on default**, such as uncovered checks, payment orders, foreclosures and checks to be paid, applications and decisions for resolution and bankruptcy.
- f) **Transaction risk rating data**.
- g) **Contract data with undertakings for the acceptance of cards (acquiring)** that have been terminated by credit institutions or card issuing and management companies cooperating with the Customer, for reasons that constitute a breach of the terms of the relevant contracts (e.g. acceptance of cards that have been declared as lost, fictitious transactions, self-financing, etc.).

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h) **Data relating to the Customer's identity and transactional behaviour**, provided by devices (e.g. mobile phones, tablets) connected to NEXI systems or applications, such as an IP address or other data provided through the above devices as position and location identifiers, as well as Internet navigation data (cookies), which alone or in combination with unique identifiers, may be used for the identification of the Customer.

i) **Data relating to telephone conversations and / or video calls (videoconference)** between NEXI and the Customer, which, if recorded, shall be done only in accordance with the applicable legal framework.

j) The **approved electronic signature certificate of the Customer**, issued by an Approved Trust Services Provider in accordance with Regulation (EU) 910/2014 (eIDAS), as applicable.

k) **Financial data and invoicing data required for the execution of the Contract**, such as IBAN and the bank account details for the settlement of standing orders.

\* With the exception of data under 'a' and 'b' which are absolutely necessary for each Customer's commercial or contractual relationship with NEXI, the type and number of other data collected depends on the type of contractual relationship and the product or service offered or provided.

## II. Where do we collect your data?

The personal data referred to above shall be collected from the following sources as appropriate:

a) The identification and communication data (under I, a-b above) are collected either directly from the Customer, through their disclosure, by physical presence and / or by electronic means, or through third parties, following the relevant authorisation of the Customer. Also, data may be collected from public databases, with or without the relevant order / authorisation of the Customer (e.g. eGov-KYC of the General Secretariat of Information Systems), from public authorities and services within the scope of their responsibilities or upon authorisation by the Customer (e.g. Tax Office, Prosecution, Ministries, supervisory authorities, etc.).

b) The financial and asset status data (under I, c above) are collected either directly from the Customer, through their disclosure through physical presence and / or by electronic means, or through third parties, following the relevant authorisation of the Customer. Furthermore, data may be collected from databases, with or without the relevant order / authorisation of the Customer (e.g. eGov-KYC of the General Secretariat of Information Systems, e-EFKA of the National Social Security Agency, etc.), from publicly accessible sources, such as land registry offices, cadastral offices and the Mortgage Registration System of TIRESIAS SA (as defined below).

c) The data from the operation of the Contract (under I, d above) are collected by the NEXI systems and directly from the Customer.

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d) The data on default and classification of trading risks (under I, e, f above) are collected from the Customer as well as by the Systems of information providers operating in the Greek market, such as TIRESIAS SA and ICAP CRIF SA (as defined below), and from other financial behaviour data files that are legally operating in Greece or abroad, cooperating with NEXI Debtor Information Companies of Law 3758/2009, law firms and lawyers and court bailiffs, where applicable, to the extent permitted and subject to the conditions laid down in the applicable legislation.

e) Data concerning to termination of contracts with undertakings for the acceptance of cards (under I, g above) from NEXI systems and / or TIRESIAS SA systems (as defined below).

f) Data relating to the identity and transactional behaviour, position or location identifiers of the Customer (under I, h above) shall be collected by the NEXI systems or applications to which the data subject was connected, as well as by services providers cooperating with NEXI.

g) The NEXI telephone conversations data with the Customer, and the video call data through two-way visual and audio communication in real time (videoconference) (under I, i above) from the NEXI recording systems or the companies cooperating with it.

h) The approved electronic signature certificate of the Customer (under I, j above) from Approved Trust Services Providers with which NEXI cooperates for its issuance.

The company under the name "Bank Information Systems SA" and the trade name "TIRESIAS SA" is responsible for the processing of financial behaviour data on behalf of the country's banking system. You can contact TIRESIAS SA, located at 2 Alamanas Street, 151 25 Maroussi, at 210 367 6700. For the processing of the data performed, as well as for the exercise of your relevant rights, you can be informed from the website of [www.teiresias.gr](http://www.teiresias.gr).

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The company under the name "ICAP CRIF SA" is engaged in the collection, management and provision of commercial and financial information (business information). ICAP CRIF SA, which is located at 2 Eleftheriou Venizelou Street, Kallithea, PC 17676, can be contacted by email at [customer@icapcrif.com](mailto:customer@icapcrif.com). For the processing of the data carried out, as well as for the exercise of your relevant rights, you can be informed from the website [www.icapcrif.com/privacy-notice](http://www.icapcrif.com/privacy-notice)

The Customer is obliged to immediately notify NEXI in any case of change of his or her identification and communication data, as well as of his or her financial data, as appropriate, in accordance with the provisions of par. c of Chapter III.

### III. Why do we collect your data and how do we process such data?

The personal data collected as above, either before, or at the beginning of the Customer's trading relationship with NEXI, or subsequently during the performance of the above Contract, are processed for the following purposes:

a) The identification and communication data (under I, a and b above) for the identification of the Customer, under the obligations of NEXI "know your Customer" (KYC), for the prevention and suppression of money laundering, the preparation of the contract with the Customer, as well as for the issuance of an approved digital certificate in accordance with Regulation (EU) 910/2014 (eIDAS), as applicable, in the context of the submission of a relevant application to an Approved Trust Services Provider.

(Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6 par. 1b GDPR), as well as for compliance with a legal obligation to which the controller is subject (e.g. Law 4557/2018 as in force) (Article 6 par. 1c GDPR).

The communication data (under I, b above), in addition to their processing for the identification of the Customer, are also subject to processing for the following purposes:

- The communication with the Customer in the context of the performance of the Contract, whenever necessary.

(Processing is necessary for the performance of a contract to which the data subject is party (Article 6 par. 1b GDPR)).

- The communication with the Customer to inform him about the utilisation of the services provided by NEXI, its capabilities, features, functionalities, opportunities for use and their developments.

(Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6 par. 1b GDPR))

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- The dispatch of commercial promotional communications to the Customer regarding the new services of NEXI and other companies of the Group, in accordance with the provisions of Article 11 par. 3 of Law 3471/2006.

(Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6 par. 1f GDPR))

(The dispatch of commercial promotional communications, when not based on the explicit consent of the Customer, shall be carried out in accordance with the provisions of Article 11 par. 3 of Law 3471/2006. In particular, the Company is Controller of the contact details provided by Customers in the context of the contractual relationship and for the purpose of direct marketing of products and services. In this context, the Company sends to the Customer promotional / informative material about its activities, products and services of the Company and its partners via email, text message (SMS) or any other appropriate way (e.g. Viber, WhatsApp, etc.). The Company collects the personal data (email, telephone number, etc.) of the Customers for the direct marketing of products or services, including personalised information based on the preferences of the Customer for commercial purposes. The Customer has the right to oppose, in an easy and free way, the collection and use of its data for the purpose of direct marketing of products or services, as well as for any kind of advertising purposes, including communication for personalised product or service proposals. Specifically, the Customer has the possibility to oppose, upon relevant notification hereof, by sending an e-mail to [npgr.dpo@nexigroup.com](mailto:npgr.dpo@nexigroup.com) or by mail (physical mail), sending his request to: Charilaou Trikoupi 15, PC 106 78, Athens, Greece, to the attention of the Data Protection Officer (DPO). In any case, the Customer may object by selecting the corresponding link in each commercial promotion communication it receives.)

- The information of the Customer for participation in reward programs, draws, NEXI competitions. (Processing is necessary for the performance of a contract to which the data subject is party (Article 6 par. 1b GDPR)).

- The investigation of the degree of satisfaction of the Customer by the services provided by NEXI and / or the further wishes or requirements of the Customer for the purposes of analysing the efficiency of NEXI services and the design and availability of new services. (Processing is necessary for the purposes of the legitimate interests pursued by NEXI to expand its business and improve the services provided to Customers (Article 6 par. 1f GDPR)).

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b) The data from the performance of the Contract (under I, c, d, above) for the monitoring of its development and the transactional behaviour of the Customer as well as the clearing of transactions and the settlement of standing orders (Article 6, par. 1b GDPR).

c) The financial and asset status data, default of financial obligations and the classification of transaction risks (under I, c, e, f above) in the event that the risk is taken by NEXI, due to the nature and characteristics of transactions with Cards that are carried out in the Company, for the assessment of the above risk that NEXI is either called upon to undertake or has already undertaken (e.g. in the case of remote transactions), as well as for the prevention and suppression of money laundering and the financing of terrorism.

(Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6 par. 1b GDPR), for compliance with a legal obligation to which the controller is subject (e.g. Law 4557/2018 as in force) (Article 6 par. 1c GDPR), as well as for the purposes of the legitimate interests pursued by the controller to minimise the risk and ensure the security of trade (Article 6 par. 1f GDPR).

d) The data of terminated contracts with undertakings for the acceptance of cards (under I, e, g above) to prevent fraudulent, irregular or illegal transactions and the protection of card trading systems.

(Processing is necessary for compliance with a legal obligation (e.g. Law 4537/2018 on payment services, Law 4557/2018 on the prevention and suppression of money laundering and terrorist financing, as both currently in force) to which a controller is subject (Article 6 par. 1c GDPR), as well as for the purposes of the legitimate interests pursued by the controller for security in trade and financial freedom (Article 6 par. 1f GDPR)).

e) Data relating to identity identifiers (under I, the above) for the prevention of fraud, malware protection, DDoS (Denial of Service) type attacks against NEXI, the Group companies or its Customers, such as and any other unlawful act, including phishing incidents.

(Processing is necessary for compliance with a legal obligation (e.g. Law 4537/2018 payment services as applicable) to which a controller is subject (Article 6 par. 1c GDPR), as well as for the purposes of the legitimate interests pursued by the controller for security in trade (Article 6 par. 1f GDPR)).

f) The data of telephone conversations and video calls (under I, i above) for the purpose of proving the content of the communication in the context of the performance of the Contract.

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(Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6 par. 1b GDPR)).

g) The electronic signature data (under I, j above) for the purposes of issuing an approved electronic signature certificate, for the signing of digital contracts concluded remotely by electronic means.

(Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6 par. 1b GDPR)).

In addition to the above, NEXI may also process the necessary data from the aforementioned data as appropriate:

- For its compliance with its obligations arising from the relevant legislative, regulatory and supervisory framework as applicable and the decisions of the authorities or courts.
- For the exercise of its rights and the defence of its legitimate interests.

#### **IV. Who are the recipients of the data?**

a) The employees of NEXI, who are responsible for the evaluation of the Customer's requests for the provision of services under the Contract, for its management and performance, for the fulfillment of the obligations arising thereunder, as well as related obligations that are imposed by law.

b) Card organisations (Visa, Mastercard, etc.) for the operation of the card payment system bearing their trade marks.

c) The relevant Alpha Bank executives, in the context of its cooperation with NEXI and the provision of the services provided for in the above contract, such as the risk assessment of the counterparty and the risk of money laundering (indicatively), clearance of transactions, and the relevant debits and credits of the account held at the Bank, the assessment of the volume of card transactions in the Company, both numerically and quantitatively, the management of fraudulent and / or contested transactions or the management of claims from the Contract, under the condition of confidentiality and professional secrecy.

d) Natural and legal persons, subject to compliance in all cases of professional confidentiality and the duty of confidentiality and privacy, to which NEXI entrusts the execution of specific tasks on its behalf, including, inter alia, the following companies:

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- Network / POS service providers and related technical support providers,
- Information of debtors (Law 3758/2009),
- Telephone support - call centers,
- The provision of consulting services (e.g. technical, organisational, IT, financial, such as experts, etc.),
- Consulting firms providing security for systems and networks, including data traffic,
- Database management,
- Communications data and / or asset investigations,
- Storage and file management,
- Market research and customer satisfaction surveys, advertising and product promotion on behalf of NEXI,

as well as,

- Lawyers, law firms, notaries and court bailiffs,
- Intermediaries of Law 4640/2019 and intermediation service centers,
- Postal service providers,
- Providers of development, maintenance, configuration of IT applications and video identification,
- Providers of e-mail services, Internet hosting services, including cloud services,
- Natural or legal persons who process data for the purpose of updating such data, including updating their contact details,
- Undertakings participating in NEXI's reward or loyalty programs.

e) Companies that provide audit services regarding the fulfillment of your obligations towards NEXI and Card Organisations (Visa, Mastercard, etc.), provided that the confidentiality and privacy of the processed data are respected.

f) Credit institutions and payment service providers based in Greece or abroad, which have been licensed and are legally operating for the execution of contracts or transactions (SWIFT, SEPA, VISA, MASTERCARD, DIAS SA, etc.).

g) Supervisory, auditing, independent, judicial, public and / or other public authorities and bodies in the framework of their statutory responsibilities, duties and authorities (e.g. Bank of Greece).

h) TIRESIAS SA for the data relating to the file of terminated contracts for the acceptance of Cards.



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- i) Approved Trust Services Providers in accordance with Regulation (EU) 910/2014 (eIDAS), as applicable in the context of the issuance of an approved electronic signature certificate.
- j) Companies of certified auditors.
- k) Existing or potential buyers of all or part of the activities or assets (including rights) of NEXI.

### **V. Are data transmitted to non-EU countries (third countries) or to an international organisation?**

NEXI may transmit its Customer personal data to non-EU countries (third countries) in accordance with the applicable European and domestic legislation governing such transfers. Such transmission may occur in the following cases:

- a) Where the European Commission has adopted a decision on the adequate protection of personal data in that country or in that international organisation,
- b) Where appropriate guarantees have been provided for the processing of personal data, such as the signing of standard contractual clauses,
- c) Where standard contractual clauses have been signed,
- d) Where the Customer has been specifically informed and has given his or her explicit consent to NEXI and the other conditions of the legal framework are met,
- e) Where the transfer is necessary for the execution of a contract, such as where the transfer is necessary for the execution of payment orders in a bank account of a third country credit institution,
- f) Where the transfer is necessary for the establishment, exercise or support of legal claims or the defence of NEXI rights,
- g) Where there is a relevant obligation for NEXI by a provision of law or a transnational or international convention.

For the fulfillment of the above under (e) or (f) obligations, NEXI may forward the Customer's personal data to competent national authorities in order to be forwarded through them to the respective authorities of third countries.

### **VI. How long will the data be kept?**

- a) In case of conclusion of the Contract with NEXI, the latter shall retain the personal data of the Customer until the completion of the statutory limitation period of claims, i.e. for a period of up to twenty (20) years from the end of the relevant Contract in any way and the clearance of the financial outstanding affairs between the parties under the Contract.

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b) In case of non-drafting of a Contract, the Customer's personal data shall be retained for up to five (5) years (in accordance with the law, the limitation period of commercial claims).

If by the end of the retention periods under (a) and (b) there are ongoing legal proceedings with NEXI or any related company directly or indirectly related to the Customer, those data retention times shall be extended until the issuance of an irrevocable court decision.

The retention time shall be completed at the end of the year during which the limitation period is completed.

In the event of a shorter or longer data retention period under the law or regulatory acts, the data retention times will be reduced or increased accordingly.

Contract documents in paper form bearing the Customer's signature, in which personal data have been registered, may, after five years, at the discretion of NEXI, be kept only in electronic / digital format.

### **VII. What are the data protection rights of the Customer?**

The Customer has the following rights:

- a) To know which personal data concerning him or her are kept and processed by NEXI, as well as their origin (right of access).
- b) To request the correction and / or completion thereof so that they are complete and accurate, providing any necessary document from which the need for completion or correction (right to rectification) arises, which is also an obligation of the data subject.
- c) To request the restriction of the processing of its data (right to restriction of processing).
- d) To refuse and / or oppose any further processing of his or her personal data held by NEXI (right to object).
- e) To request the erasure of its data from the NEXI files (right to be forgotten).
- f) To request from NEXI to receive the data concerning him or her, which he or she has provided to NEXI, in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller (right to data portability).

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g) To withdraw his or her consent if he or she provided it in those cases which constitute a legal basis for the processing of his or her personal data.

It is noted that the satisfaction of the requests under c, d and e, if they relate to data necessary for the preparation or continuation and operation of the Contract, irrespective of the source of their collection, implies its automatic termination by the Customer, according to the relevant conditions or the inability to examine a request of the data subject.

Furthermore, NEXI has in any case the right to refuse the request to limit the processing or erasure of the Customer's data if the processing or retention of the data is necessary for the establishment, exercise or support of its legitimate interest, legal rights or compliance with its legal obligations in accordance with III, mentioned above.

The exercise of the right to portability (under f above) does not entail the erasure of data from NEXI files, which is subject to the terms of the immediately preceding paragraph.

The exercise of the above rights acts for the future and does not relate to already processed data.

The Customer has the right to lodge a complaint with the Data Protection Authority, ([www.dpa.gr](http://www.dpa.gr)), 1-3 Kifissias St., 115 23, Athens, tel. 210 - 6475600, which is the competent supervisory authority for the protection of the fundamental rights and freedoms of natural persons in relation to the processing concerning him or her, in so far as it considers that its rights are being infringed in any way.

### **VIII. How can Customers exercise their rights under VII above?**

For the exercise of the above under VI rights, the Customer may:

- Contact NEXI by e-mail at: [npgr.dpo@nexigroup.com](mailto:npgr.dpo@nexigroup.com)

or

- By mail (physical mail), by sending the request to the following address: Charilaou Trikoupi 15, PC 106 78, Athens, Greece, to the attention of the Data Protection Officer (DPO).

NEXI shall make every effort to respond to the Customer within thirty (30) days of the submission of the request, but may be extended for sixty (60) additional days if required at the discretion of NEXI, taking into account the complexity of the request and the number of requests. NEXI will inform the Customer in any case of extension of the period of thirty (30) days, within thirty (30) days from the receipt of the request, as well as the reasons for the extension.

If NEXI fails to act on the request of the Customer, it shall inform it without delay and no later than thirty (30) days from the receipt of the request, for the reasons for which it did not act and for the possibility of filing a complaint and lodging an appeal.

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The above service is provided free of charge. However, if the Customer's requests are manifestly unfounded, excessive or repeated, NEXI may either impose a reasonable fee on the Customer by informing the Customer or refuse to respond to such requests.

### **IX. What are the technical and organisational measures implemented by NEXI?**

NEXI implements an information security management system to ensure the confidentiality, security of the processing of Customer data and their protection against accidental or unlawful destruction, loss, alteration, prohibited dissemination or access and any other form of unlawful processing and is bound to apply and maintain appropriate technical, organisational, administrative and physical security measures. In order to determine the appropriate technical and organisational security measures, NEXI shall take into account:

- The available technology and international best practices,
- The nature, scope, context and purposes of the processing,
- The risks of use and processing for the rights and freedoms of data subjects, in particular as a consequence of any destruction, loss, alteration, unauthorised disclosure or unauthorised access to data transferred, stored or otherwise used, whether by mistake or unlawfully,
- The likelihood that the processing will have an impact on the rights and freedoms of data subjects,
- The recommendations of the competent national authorities (e.g. the Hellenic Data Protection Authority, the Hellenic Authority for Communication Security and Privacy - ADAE, the PCI Standards, the European Data Protection Board, the European Union Agency for Cybersecurity (ENISA) etc.), and
- The applicable rules and standards.

All NEXI personnel who process personal data shall receive relevant training on data protection principles. NEXI ensures that every member of its staff who has access to personal data is bound by appropriate confidentiality obligations through their contractual or employment relationship with the Company. In the event of an incident involving unauthorised access to personal data, NEXI shall apply the applicable Data Breach Disclosure Procedure established in accordance with the applicable legislation requiring the disclosure of breach events, i.e. the provisions of the GDPR, the Law on Personal Data Protection, and the guidelines of the Hellenic Data Protection Authority. Where appropriate, NEXI shall also inform the law enforcement authorities, financial or other regulatory authorities and / or government agencies (including any competent authorities). These measures are reviewed and updated by NEXI at regular intervals based on available technology and advanced guidelines on data breach incidents and their management.

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### **X. What about profiling and automated decision-making?**

In the context of the implementation of the Contract, we may proceed to automated decision-making and profiling, where permitted by applicable law. The legal basis for profiling and automated decision-making is the legitimate interest of the Company (Article 6 par. 1 f GDPR).

### **XI. How is this privacy notice updated?**

This privacy notice replaces the privacy notice which is contained in the Annex to the "Cooperation Agreement with undertakings for the acceptance of cards".

NEXI may update, supplement and / or modify this Privacy Notice, in accordance with the applicable regulatory and legislative framework. In this case, the updated privacy notice will be posted on the relevant website of the Company.

### **COMMUNICATION DETAILS**

#### CONTROLLER

NEXI PAYMENTS GREECE SA Postal address: Charilaou Trikoupi 15 106 78, Athens, Greece

#### DATA PROTECTION OFFICER

Postal address: Charilaou Trikoupi 15 106 78, Athens, Greece E-mail: [npgr.dpo@nexigroup.com](mailto:npgr.dpo@nexigroup.com)

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