

## **EUROBANK HISTORICAL ARCHIVE RESEARCHER PERSONAL DATA PROCESSING NOTICE**

In its capacity as data controller, Eurobank S.A. (hereinafter the “Bank”) informs you in accordance with Regulation (EU) 2016/679 (hereinafter the “Regulation” or “GDPR”), Law 4624/2019 and other provisions of the relevant Greek and EU legislation on the protection of personal data, that it processes your personal data as a researcher interested in the Eurobank Historical Archives (hereinafter “EHA”) in accordance with the points made below. This information may be supplemented by more specific updates as appropriate, such as cases of processing of data from cookies/other trackers collected via the website (currently [www.eurobank.gr](http://www.eurobank.gr)), video surveillance systems, etc.

### **1. What personal data does the Bank collect from you and from where?**

The personal data collected by the Bank may include the following, but all that data may not relate to you in their entirety:

A. Data from the *Researcher Application Form for Visiting the EHA* and the *Researcher Onsite Application Form* you submit (the first document is submitted online and the second is submitted in the original signed during your visit to the EHA in person), namely your first and last name, occupation/post, your organisation, phone number, email address, ID card or passport number, the subject matter and purpose of research, disclaimers, submission date, etc.

B. Data from the Visitor Log kept at the EHA premises by Bank employees which records the data of EHA visitors/researchers, namely the first and last name, archival materials used, date of visit, any comments.

C. Data arising from copies of studies or other use of archival materials, or any other documents submitted to the Bank/EHA.

D. Data from your communications in general with the Bank/EHA, for example in the context of scheduling your visit to the EHA, obtaining authorisations to publish or promote EHA archival material, subscription to the EHA newsletter, etc.

According to the GDPR, personal data should be up-to-date and accurate. Consequently, you are responsible for providing the Bank with accurate, up-to-date personal data and for informing it about any change in that data as soon as possible.

### **2. For what purposes does the Bank collect your personal data and on what legal bases does it process it?**

The Bank collects and processes your personal data which is necessary in each case. In particular:

A. The Bank processes the data in the *Researcher Application Form for Visiting the EHA* to explore the possibility of and to schedule a visit to the EHA and to contact you for that purpose. Such processing is based on the express consent (Article 6(1)(a) of the GDPR) you provide to us in the context of submitting the said document and any refusal to grant such consent results in the Bank being unable to examine and respond to your request.

B. The Bank processes the data in the *Researcher Onsite Application Form* to approve or reject your access to the EHA archival materials. Such processing is based on the express consent (Article 6(1)(a) of the GDPR) you provide to us in the context of submitting the said document and any refusal to grant such consent results in the Bank being unable to examine and respond to your request. More specifically, the data from the application form that you wish to register for the EHA newsletter is processed for the purpose of communicating with you in the context of briefing you about EHA activities and that processing is based on the express consent (Article 6(1)(a) of the GDPR) provided to us in the context of submitting the application. You can withdraw your consent at any time.

C. The Bank processes the data in the *Visitor Log* to know which persons enter and leave the EHA premises for reasons of your own security (e.g. in cases where the premises need to be evacuated) and that of the premises themselves, the archival materials and the persons and goods located there, and to know which archival materials access has been granted to, in order once again to protect the archival materials based on the legal basis for processing, which is the need to serve the legitimate interests of the Bank or a third party (Article 6(1)(f) of the GDPR), as those purposes (legitimate interests) are set out directly above in this paragraph. Moreover, the data on the number of visitors and the archival material used, contained in that log, are used to produce consolidated analyses/statistics without reference to data which identify specific data subjects. The legal basis for processing here is the need to serve the Bank's legitimate interests (Article 6(1)(f) GDPR) in analysing visits to the EHA, including for organisational reasons, to determine the popularity of specific archival materials in the EHA, etc.

D. All the above data (points A, B and C) may also be used to defend the Bank's or a third party's lawful rights and interests and to establish, exercise and defend claims. It is self-evident that the Bank has a legitimate interest in obtaining legal protection until the dispute is resolved in or out of court.

E. Lastly, it should be expressly clarified that the legal and regulatory framework in force from time to time and the decisions of authorities or courts in specific cases require the Bank to provide data and to collaborate in the context of requests submitted to it by various authorities/bodies to which the Bank has a legal obligation to respond (Article 6(1)(c) of the GDPR).

### **3. Who receives your personal data?**

The Bank has access to your data and in particular the competent employees/executives and members of its management team in the context of their duties and competences and on a "need to know" basis.

The recipients of your data may include the following:

1. Providers of IT products and/or services (including cloud computing services) and/or maintenance/support of all manner of IT and electronic systems and networks, including online systems and platforms, as well as providers of electronic communications services, and information society services (such as telecommunications, email service providers) to maintain the effective and secure infrastructure necessary for the Bank's operation.
2. Record and data storage, filing, management and destruction companies.
3. Lawyers, law firms, court process servers, experts, expert witnesses and consultancy service providers in the context of their duties.
4. Supervisory, independent, judicial, prosecuting, police, public/administrative authorities and/or other authorities or bodies in the context of their competences, accredited

mediators and mediation service centres, arbitration tribunals and alternative dispute resolution bodies.

#### **4. How long does Eurobank retain your personal data?**

Your personal data is held for the time necessary to achieve the purpose of processing, or in the alternative for the time required in accordance with the applicable legal or regulatory/supervisory framework from time to time or to defend rights and legitimate interests and file claims. For example:

A. Your data from the *Researcher Application Form for Visiting the EHA* is safely destroyed either after the passage of 1 month from your visit to the EHA by appointment and you positively confirming that you can visit, or after the passage of 3 months from the Bank's negative response to your application.

B. Your data from the *Researcher Onsite Application Form* is kept for a period of 5 years either from your visit to the EHA after positive confirmation that the EHA archival materials can be searched or from rejection of your application by the Bank. For all persons who have registered for the newsletter, the *Researcher Onsite Application Form* will be kept for such time as you remain registered to receive it and for a period of 6 months after you unregister. If litigation involving the Bank relating directly or indirectly to you has been commenced or commences by the end of the said data retention periods in each case, the retention period for personal data relating in any manner to those matters shall be automatically extended until a final court judgement is handed down.

C. Your data from the *Visitor Log* is kept for a period of up to 24 months and during the month of January each year the data from the previous year is safely destroyed, with the exception of certain data such as the number of visitors and archival materials to which access was given, which are kept grouped without names to generate consolidated analyses/statistics in accordance with point 2.C above. In the event of an illegal act or if preliminary investigations, main investigations or judicial proceedings are under way involving the Bank, relating directly or indirectly to you, or if there is a need to comply with a legal obligation, the retention period for your personal data may be extended until the relevant matter is resolved or until an irrevocable court judgement is handed down or the relevant legal obligation has ceased to apply.

#### **5. Data transmission outside the European Economic Area (EEA)**

The Bank ensures that your data is primarily processed within the EEA and collaborates in most cases with service providers established within the EEA. In cases where it is necessary for the Bank to send your personal data outside the EEA, for example to a third-party service provider registered outside the EEA, the said transmission shall in all events be subject to the terms, conditions and guarantees laid down in Articles 44 to 49 of the GDPR.

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

You have the following rights to the extent that they apply in this case:

a) Right of access: You can ask to learn about the categories of personal data we process and/or for copies of your personal data we keep, their origin, the purposes for which they are processed, the categories of recipients, the retention period, and other relevant rights.

b) Right of rectification: You can request that your personal data processed by the Bank be corrected and/or supplemented so that they are complete and accurate, by submitting all necessary documents showing the need for correction or supplementation.

c) Right to restrict processing: You can ask for a restriction on the processing of your data.

d) Right to object: You can object to the processing of your personal data, especially when you have documented doubts about their accuracy or the legality of processing or wish further retention to defend your rights. You are also entitled to object at any time to the processing of personal data relating to you which are processed for direct marketing purposes.

e) Right to be forgotten: You can request the erasure of your personal data under certain conditions, such as when the data are no longer necessary, you have withdrawn your consent, provided that this is the sole legal basis for processing, the data have been unlawfully processed, and so on.

f) Right to data portability: You can obtain the personal data relating to you which you have provided to the Bank. That data will be provided in a structured, commonly used and machine-readable format. You can request that your data which are processed with your consent or in the context of implementing a contract using automated means be transferred from the Bank to another controller.

g) Right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

h) Right to complain to the Data Protection Authority: You have the right to lodge a complaint with the Hellenic Data Protection authority (1-3 Kifisias Avenue, 11523 Athens, Tel. +302106475600) 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](http://www.dpa.gr)– Individuals – Complaint to the Hellenic DPA).

Please note the following as regards your abovementioned rights:

i. In any case, the Bank has the right to deny your request for restriction of processing or erasure of your personal data if the processing or retention of your data is necessary for it to establish, exercise or defend its legal rights, or fulfil its obligations.

ii. The exercise of these rights is valid for the future and does not affect any previous data processing.

iii. The Bank is entitled to request that you provide additional information necessary to confirm your identity.

## **7. How you can exercise your rights:**

To exercise your rights (including withdrawing your consent) you can contact us at the following address: 10 Filellinon and 13 Xenofontos Streets (2nd floor), 10557 Athens or by email [athistoricalarchives@eurobank.gr](mailto:athistoricalarchives@eurobank.gr). When submitting a request to exercise your rights, please specify which right(s) you are exercising, to facilitate the Bank's review and response process. The Bank shall make concerted efforts to respond to your request within 30 days of

receiving it. The abovementioned period may be prolonged for 60 more days if deemed necessary at the Bank's absolute discretion, taking into consideration the complexity of the issue and the number of requests. The Bank shall inform you within 30 days of the request being received in any case of prolongation of the abovementioned period. This service is provided by the Bank free of charge. However, if your requests are blatantly unfounded, excessive or repeated, the Bank may require the payment of a reasonable fee, after informing you accordingly, or refuse to respond to your request(s).

#### **8. Data Protection Officer**

You can contact the Bank's Data Protection Officer about issues relating to the processing of your personal data at 6 Siniosoglou Street, 14234 Nea Ionia, or at the email address [dpo@eurobank.gr](mailto:dpo@eurobank.gr).

#### **9. How does the Bank protect your personal data?**

The Bank takes appropriate organisational and technical steps to ensure data security, and to safeguard data confidentiality processing and protection against any random or unlawful destruction, random loss, corruption, prohibited disclosure or access, or any other form of illegal processing.

#### **10. Amendments to this Notice**

This Notice may be amended from time to time, to always be in compliance with legal requirements and the actual facts of the processing carried out. When significant amendments are made to this Notice, you will be informed by any appropriate means, for example by a relevant notification on the Bank's website (<https://www.eurobank.gr/en/group/about-eurobank/the-eurobank-historical-archives/a-century-of-banking-history/>). To ensure you are using the latest/updated version of this Notice, in case minor amendments or improvements are made, it is recommended that you regularly check the Bank's website (<https://www.eurobank.gr/en/group/about-eurobank/the-eurobank-historical-archives/a-century-of-banking-history/>) where this Notice is posted at all times.

#### **11. Entry into effect**

This Notice was drawn up on 12.07.2022, when it was posted on the Bank's website (<https://www.eurobank.gr/en/group/about-eurobank/the-eurobank-historical-archives/a-century-of-banking-history/>) and entered into effect, and has been posted continuously since then on that website and is available in hard copy at the EHA Reading Room and a copy hereof is provided to each Researcher when they submit a Researcher Onsite Application Form.