



NOTIFICATION ON THE PROCESSING OF ALPHA SERVICES AND HOLDINGS'S SHAREHOLDERS' PERSONAL DATA

A. PROVISION OF INFORMATION TO DATA SUBJECTS

ALPHA SERVICES AND HOLDINGS S.A. (hereinafter referred to as "the Company"), in its capacity as data controller, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), Greek Law 4624/2019 and regulatory framework on personal data, informs the natural person who either is or has been a Shareholder of the Company, anyone holding voting rights, their proxies as well as Shareholders' representatives or holders of voting rights on behalf of a legal entity (each of the above referred to hereinafter as "Shareholder") that the Company itself and/or third parties, acting on the Company's instructions and on its behalf, process personal data relating to these persons due to their capacity as Shareholders of the Company, in the way described below.

I. What kind of data do we collect?

- a) Identification data, such as name and surname, father's name, Identity Card Number or other equivalent document, passport data, Tax Registration Number, profession, nationality and other demographic data.
- b) Communication data, such as postal and e-mail address, telephone number and mobile telephone number.
- c) Number and type of shares.
- d) Investor Account Number in the Dematerialised Securities System (DSS).
- e) Data pertaining to the capacity under which the Shareholder participates in the General Meeting and the respective documents attesting to this capacity.
- f) Data originating from correspondence with the Shareholders
- h) Data pertaining to the subscription and use of electronic platform, such as identification and connection data, ip address, for the participation in General Meeting that takes place remotely in real time via teleconference
- i) Audio/voice data from your participation in General Meeting that takes place via teleconference

II. Where do we collect your data from?

The above-mentioned personal data are collected from the Shareholder or from the company "Hellenic Central Securities Depository S.A.".

In cases where the Shareholder appoints a Representative for his participation in the Company's General Meeting, he must inform the Representative of the provision of his identity and contact details to the Company and the processing carried out by the Company, prior to such provision.

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

Personal data collected in the way described above, in accordance with the legal and regulatory framework in force, are processed for the following purposes:

- a) Identifying the Shareholder.
- b) Communicating with the Shareholder.
- c) Checking the ability to exercise and the legality of exercising shareholder rights in accordance with the law (indicatively, exercising voting rights at the General Meeting, Shareholders Register, keeping the Minutes of the General Meeting, participating in corporate actions)
- d) Fulfilling the Company's obligations against its Shareholders.
- e) Complying with the Company's legal obligations.
- f) Fulfilling and supporting the legal rights and legitimate interests of the Company.
- g) Keeping historical records of the Company's Shareholders.



IV. Who are the data recipients?

- a) Alpha Bank S.A. Employees, which performs all the necessary actions for keeping the Shareholder registry on behalf of the Company.
- b) Natural persons and legal entities, to which the Company assigns the execution of certain tasks on its behalf, such as, inter alia, database management companies, file storage and record-keeping companies, postal services providers, providers of services related to the development, maintenance and customization of IT applications, e-mail services providers, companies providing web hosting services, including cloud services, lawyers and law firms, statutory certified auditors or audit firms.
- c) The company "Hellenic Central Securities Depository S.A.".
- d) Supervisory, audit, independent, judicial, public and/or other authorities and bodies within the scope of their statutory tasks, duties and powers (indicatively, the Bank of Greece, the European Central Bank, the Hellenic Capital Market Commission).
- e) Other Shareholders, as provided by law.

V. Are the data transferred to non-EEA countries (third countries) or to an international organization?

The Company may transfer the Shareholder's personal data to non-EEA countries (third countries) or to an international organization for the following reasons:

- a) where the transfer is necessary for the execution of contractual obligations,
- b) where the transfer is necessary for the establishment, exercise or support of legal claims or the defense of the Company's legal rights,
- c) where the transfer is necessary under a statutory provision or a transnational or international convention, or
- d) for the purposes of the Company's compliance with rules relating to the automatic exchange of information in the tax area, provided for by the statutory and regulatory framework, where the following conditions apply:
 - The European Commission has issued an act for the adequate level of protection of personal data in the third country or the international organisation in question,
 - The Shareholder has been specifically informed and has given his express consent to the Company, provided also that the rest of the conditions laid down in the legislative framework is met.

In order to fulfill the obligations under points c) or d) above, the Company may transfer the Shareholder's personal data to the competent national authorities, in order for them to forward these data to the relevant authorities of third countries.

VI. For how long are the data retained?

Personal data are retained by the Company for the time period required by law or in accordance with the legal base pertaining to retaining data based on the purpose served by their processing as well as for the time period required in accordance with the legislative framework in force each time pertaining to the exercising of claims or to defending legal interests of the Company.

Personal data under point I above, are retained until the completion date of the relevant statutory period of general limitation for the protection of the legal interests and the exercise of the Company's rights.

Shareholder's data that are included in the minutes of all forms of the Company's General Meetings are retained for ever in its historical archives.

VII. What rights does the subject have for the protection of his data?

Under the GDPR the data subject may exercise the right:



- a) To know which personal data concerning him are being stored and processed by the Company as well as their source (right of access).
- b) To request for the rectification and/or supplementation of these data, so as to be complete and accurate, by submitting any necessary document which shows the need for supplementation or rectification (right to rectification). This is at the same time a Shareholder's obligation.
- c) To request for the restriction of processing concerning his personal data (right to restriction of processing).
- d) To deny and/or object to any further processing of his personal data retained by the Company (right to object).
- e) To request for the erasure of his personal data from the Company's records (right to be forgotten).
- f) To request for the transfer of the data he has provided to the Company to another controller (right to data portability).

The Company has, in any case, the right to refuse a Shareholder's request for restriction of processing or erasure of his personal data, if the processing or maintenance of these data is necessary for the retention of the Shareholder capacity and/or the holding of voting rights, for the exercise of his rights as a Shareholder of the Company and/or as a holder of voting rights as well as for the establishment, exercise or support of the Company's legal rights, for the compliance of the Company with legal obligations or for the fulfilment of its obligations against its Shareholders.

The Company has, in any case, the right to refuse the erasure of a Shareholder's personal data, if those are necessary for the keeping of historical records of Shareholders (under section III, point g) as well as if the processing or maintenance of these data is necessary for the establishment, exercise or support of the Company's legal rights or for the fulfilment of its obligations.

The exercise of the subject's right to data portability (under point f above) does not imply the erasure of the data from the Company's records. The exercise of these rights in general shall have effect for the future and does not concern already performed data processing.

VIII. How can the Shareholder exercise his rights?

In order to exercise his rights, as they were mentioned under section VII above, the Shareholder may contact Alpha Bank S.A.:

- via the Branch Network by submitting the Request to Exercise Rights Form,
- via telephone by calling +30 210 326 0000,
- ,
- via e-mail to SpecializedCustomerServicesUnit@alpha.gr

Furthermore, the Shareholder may print the Request to Exercise Rights Form through the Company's website, www.alphaholdings.gr, and send it by post to:

Alpha Bank SA
Specialized Customer Service Unit
276 Messoghion Avenue, GR-155 62 CHOLARGOS

The Company will endeavor to respond to the Shareholder within thirty (30) days of the submission of his request, but this period may be extended for sixty (60) additional days, if the Company considers it necessary, taking into account the complexity of the request and the number of the requests. The Company shall inform the Shareholder whenever the 30-day period is extended, within thirty (30) days from the receipt of the request and shall mention the reasons for this extension.

If the Company does not take action in relation to the request of the Shareholder, it shall inform the Shareholder without delay and within thirty (30) days of the receipt of his request at the latest, for the reasons it did not take action and for the option to submit a complaint and initiate a judicial procedure.



The above service is provided free of charge. However, if the Shareholder's claims are manifestly unfounded, excessive or recurrent, the Company may either impose a reasonable charge on the Shareholder, while providing him with the relevant information, or refuse to respond to such request.

IX. How are the Shareholder's rights protected?

The Company applies an information security management system to ensure the confidentiality and security of the Shareholders' data processing procedure and to protect them against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access and any other form of unlawful processing.

X. Filing of complaints

The Shareholder has the right to file a complaint with the Hellenic Data Protection Authority (www.dpa.gr), which is the competent supervisory authority for the protection of the fundamental rights and freedoms of natural persons with regard to their processing, when he assumes that his rights are infringed in any way and the right to a judicial remedy.

B. CONTACT DETAILS

I. DATA CONTROLLER

ALPHA SERVICES AND HOLDINGS S.A.
ADDRESS: 40 Stadiou Street, GR-102 52 ATHENS
CONTACT TELEPHONE NUMBER: +30 210 326 0330

II. DATA PROTECTION OFFICER

ALPHA BANK GROUP DATA PROTECTION OFFICER
For ALPHA SERVICES AND HOLDINGS S.A.
ADDRESS: Athinon Avenue 105, GR-104 47 ATHENS
CONTACT TELEPHONE NUMBER: +30 210 326 6953
E-MAIL: contact-DPO@alpha.gr