

GENERAL PRIVACY POLICY OF TIRESIAS SA FILES

DATA CONTROLLER

The societe anonyme under the name BANKING SYSTEMS INFORMATION SA and the distinctive title TIRESIAS SA (data controller), based at 2, Alamanas str, 15125 Maroussi (tel. 210-36.76.700), maintains the personal data files listed below.

This policy sets out the principles applied by TIRESIAS S.A. in the processing of these data (categories, legal basis, purpose, protection measures, rights, etc.) and aims to inform the data subjects on processing and is subject to change from time to time.

What is personal data?

Any information relating to an identified or identifiable natural person ("**Data subject**").

Processing

Any act or series of acts carried out, with or without the use of automated means, on personal data or on sets of personal data, from their collection, storage, deletion or destruction, or their anonymisation.

FILES MAINTAINED BY TIRESIAS

A. REFERENCE FILE

- 1. Purpose of Processing:** The correct filing of the data in the TIRESIAS archives, their constant updating, their correct correlation with the natural person to whom they relate and the safeguarding of accurate identification of the natural persons files in the archives (hereinafter referred to as "Economic Units").
- 2. Legal Basis of Processing:** Compliance with a legal obligation, i.e. keeping a complete, up-to-date and accurate data file.
- 3. Data Categories:** Information regarding the identification of natural persons, namely Tax Identification Number (TIN) and identity card (ID) or passport number of such persons, name or surname and father's name, home addresses (street, number, area, PC) and GEMI number (General Commercial Registry).
- 4. Data Sources:** The reference file data originally originated from the 1992 TIN file of the then KEPYO service, which was entrusted to TIRESIAS by the Ministry of Finance. The reference file is then enriched with additional or newer data (TIN, ID, addresses, etc.) from the printed forms or electronic documents of the primary data entered into the Units, either from the data subjects' requests submitted to TIRESIAS or from the TIN records of the General Secretariat for Information Systems of the Ministry of Finance - licensed by the Hellenic Data Protection Authority (hereinafter referred to as "DPA") with no. 21/2007.
- 5. Retention Period:** In view of the purpose of the processing served by the reference file, the retention period of the data is not subject to any time restrictions.
- 6. Data Recipients :** File data is available for own use to the following recipients:
 - a. Bank of Greece.
 - b. Credit institutions.
 - c. Financial Institutions: Factoring, leasing and payment instruments management companies.
 - d. Credit companies.
 - e. Loan and Credit Receivables Management Companies¹.
 - f. Public sector bodies with a clear public interest.

B. FINANCIAL CONDUCT DATA FILES

B.I. DEFAULT ON OBLIGATIONS DATA ARCHIVE (DOD) AND MORTGAGE - PRENOTATION DATA (MPD) ARCHIVE 109/99, L. 3816/2010 and 24/04 of the HDPDA

- 1. Purpose of Processing:** Protecting commercial credit and reorganizing financial transactions by enabling data recipients to assess the solvency of their counterparts.
 - 2. Legal Basis of Processing:** Legitimate interest sought by the recipient of the data (contract preparation and execution, compliance with legal obligations, etc.)
 - 3. Data Categories:** Data concerning the breach of specific financial obligations, which are characterized by a high degree of objectivity and relate to:
 - I. Breach of Obligations Financial Conduct Data
 - a. Bad (bounced) checks.
 - b. • Bills of exchange and promissory notes unpaid at maturity
 - c. Bankruptcy applications.
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- d. Judgements rejecting bankruptcy applications because the debtor does not have sufficient assets (no. 6 par. 2 of L. 3588/2007).
 - e. Declared bankruptcies
 - f. Orders of payment (including orders of payment of rent in arrears).
 - g. Immovable property auctions
 - h. Movable property auctions
 - i. Prenotations of mortgage converted to mortgage
 - j. Seizures and checks under L.D. 17.7/ 13.8.1923 on special provisions concerning SA
 - k. Credit card agreement termination due to use non conforming to the agreement, or due to non-service of the credit provided by such cards.
 - l. Termination of consumer, mortgage and business credit contracts due to default on payment.
 - m. Administrative sanctions, imposed by the Ministry of Finance, against tax law offenders to safeguard the interests of the State.
 - n. Reorganization applications and decisions (No. 99 et seq. of the Hellenic Bankruptcy Code)
 - o. Applications for court settlement of debts (art. 4 par. 1 of L.3869 / 2010).
 - p. Judgments on the court settlement of debts (art. 8 of L.3869/2010).
 - q. Orders for the restitution of use of leased property.
- II. Mortgage-Prenotation of Mortgage Financial Conduct Data
- a. Mortgages.
 - b. Mortgage Prenotations

4. Data Sources:

The above data is obtained from the following sources:

- a. data under I a, b, k, l, o and p data: from Credit Institutions.
- b. data under I k, l, o and p: from Credit and Financial Institutions (Credit Companies, Leasing Companies, Factoring Companies and Card Issuance and Management Companies) and Loan and Credit Receivables Management Companies².
- c. data under I f, g, h, o, p and q: from Magistrate Courts.
- d. data under I g and h: from the EFKA-TAN (Unified Social Security Institution) Auction Publication Website.
- e. data under I c, d, e, f, n and q: from Courts of First Instance.
- f. data under I f: from Administrative Court of Appeals
- g. data under I, i, j and II a and b: from Land Registry Offices and Cadaster Offices.
- h. data under item I m: by the Ministry of Finance through the Bank of Greece.

5. Retention Period:

- a. *Bad checks, overdue bills of exchange and promissory notes, and credit cards loan agreements termination data* is kept for two (2) years.
- b. Data on *orders of payment* is maintained for three (3) years.
- c. Data on *Auctions, seizures and checks to be paid* under L.D. 17.7/13.8.1923 is kept for four (4) years.
- d. *Administrative sanctions* imposed by the Ministry of Finance are kept for four (4) years.

The data shall be deleted from the Archive once the debt has been settled in full (i.e. all data recorded in the default on obligations file - except for the orders for the restitution of use of leased property - are settled and the prescribed time limit for the retention of all data of the **specific category** has expired.

Data under par b, c, d shall be deleted from the Archive once the debt has been settled in its entirety (i.e. all data recorded in the default on obligations record - excluding orders for the restitution of use of leased property- have been settled - and the prescribed time period for **all data registered** in the data file has expired.

More specifically, data relating to loan and credit card agreements termination that bear the indication refinancing or permanent settlement shall be deleted in accordance with the above, subject to the full payment of the instruments (checks, new loans, etc.) used for their refinancing/settlement.

- e. *Bankruptcy applications shall be deleted* either by registration of the judgment declaring bankruptcy declaration or, if the relevant hearing is postponed, 12 months after the date of the postponed hearing, and in each case they shall be deleted in the month in which five (5) years from the date of the filing of said applications with the competent Court are completed. If the bankruptcy application is rejected, due to lack of sufficiency of the debtor's property, this information is entered in the file retained for ten (10) years.
- f. The applications for conciliation/reorganization - including the application for (immediate) ratification of the agreement on reorganization and special liquidation process- shall be deleted after five (5) years from the date of filing with the competent Court, unless a decision on the ratification of the conciliation/reorganization agreement is issued, in which case the information on the application and

the ratification of the agreement shall be retained in the archive for five (5) years from the expiry of the term of the agreement. If the court issues a decision whereby the ratification of the agreement on conciliation/reorganization is dismissed, this information shall be kept in the archive for five (5) years from the date of publication of said decision. In the event of a decision declaring the termination of the procedure due to failure to reach an agreement (for example, in case of expiry of the time limit for reaching the agreement, renunciation on the part of the mediator), the information on the application and the respective decision shall be retained for five (5) years from the date of filing of the application with the competent court. Finally, if the court issues a decision whereby a company is placed under special liquidation process or the conciliation agreement is terminated, in the event of termination of a reorganization agreement, or in the event that a condition precedent contained in the reorganization agreement is met, or in the event of cancellation of the reorganization agreement, as well as in the event that the term of the conciliation/reorganization agreement is not available, then the information on the respective application and decision shall be retained for ten (10) years from the date of filing of the application with the competent court.

- g. Information on *declared bankruptcies* shall be deleted after ten years (10) provided that the bankruptcy process is completed and in any event after fifteen (15) years from the commencement of said process. Similarly, information on applications and decisions on the ratification of conciliation/reorganization agreement shall be in any event deleted after fifteen (15) years.
- h. Information on *mortgage prenotation, mortgages as well as the conversion of mortgage prenotations to mortgages*, shall be deleted from the Archive when removed from the respective Public Books.
- i. *Applications for the court settlement of debts*, in the event of reconciliation under Articles 5 and 7 of Law 3869/2010 as in force, shall be kept in the archive for a period of three (3) years from the payment in full of the relevant debts. If the above applications do not result in conciliation, they shall be deleted from the file three (3) years after the date of the hearing. In case of waiver of the applicant, the information related to the application shall be deleted from the file one (1) year after the filing of the application.
The *decisions on court settlement of debts* shall be retained for a period of three (3) years from the date of discharge of the debts in accordance with the first subparagraph of par. 1 of article 11 of Law 3869/2010. The decisions on the full discharge of the debtor (article 8 par. 5 of Law 3869/2010), as well as the decisions by which the debtors forfeit their rights, shall also be retained for three (3) years.
- j. The *orders for the restitution of use of leased property* shall be kept for three (3) years from publication, after which they will in any event be deleted.

As for the rest, the following general rules on the retention of the abovementioned data shall apply:

- In any event, the data of classes a through d and i shall be deleted after ten (10) years. The above rule shall not apply to administrative sanctions which have not been erased.
- Information regarding bounced checks, overdue bills of exchange, promissory notes, card and loan agreement termination, orders of payment, auction schedules, seizures, checks of LD 1923, conversion of mortgage prenotation to mortgages, applications for bankruptcy, and orders for the restitution of use of leased property provided that they do not exceed the amount of one thousand euro (€ 1,000.00) in total, shall not be transmitted. This provision shall not apply, to the extent that the DOD Archive contains information on an application for bankruptcy with no amount indicated, declared bankruptcy or administrative sanction imposed by the Ministry of Finance, or application/decision on conciliation/reorganization, or an application on the court settlement of debts, or an auction which bears the indication for continuation of the procedure with no amount denoted. Non-transmitted data reappears in case new data is entered, as a result of which the above amount of 1.000,00 euro is exceeded.
- The above information on debts, the payment of which can be proven, provided that they do not exceed the amount of 3,000 euro in total and that they are not more than three (3) shall not appear in the transferred information file, but they shall reappear if new data is entered, as a result of which either the above limits are exceeded or have not been paid.

6. Data Recipients : File data is available for own use to the following recipients:

- a. Bank of Greece.
- b. Credit institutions.
- c. Financial Institutions: Factoring, leasing and payment instruments management companies.
- d. Credit companies.
- e. Loan and Credit Receivables Management Companies³.
- f. Public sector bodies with a clear public interest.

B.II. RISK CONTROL ARCHIVE (TSEK) (HDP A 186/2014)

1. **Purpose of Processing:** Ensuring commercial credit, reliability and security of transactions and the exercise of the rights of economic freedom and free provision of information to businesses by enabling traders to assess the solvency of their counterparties.
2. **Legal Basis of Processing:** The legitimate interest sought by the recipient of the data: trade security, economic freedom and freedom of information.
3. **Data Categories:** The following default on obligations data and mortgage - prenotation data:
 - Bounced cheques
 - Bills of exchange and promissory notes unpaid at maturity
 - Applications for bankruptcy – Judgements rejecting bankruptcy applications because the debtor does not have sufficient assets
 - Conciliation / Settlement Requests and Decisions (Article 99 et seq. of the Hellenic Bankruptcy Code)
 - Declared bankruptcies
 - Orders of payment & Orders for restitution of use of leased property.
 - Auctions of immovable property
 - Auctions of movable property
 - Mortgages and prenotations of mortgage
 - Prenotations of mortgage converted to mortgage
 - Property seizures and cheque registrations under LD 17.7/13.8.1923.
 - Applications and judgments of court settlement of debts under Law 3869/2010.

In addition Company data from the Government Gazette and GEMI are provided.

4. **Data Sources:** The sources mentioned above under B - I, 4 (on a case by case basis), OGG and GEMI
5. **Retention Periods:** The periods mentioned above under B - I, 5 (relating to DOD and MPD) and below under F in respect of data deriving from OGG and GEMI.
6. **Data Recipients:** TSEK data (Tiresias Risk Control System) shall be provided, for own use, to traders and, in particular, to natural or legal persons or groups of persons within the meaning of the Hellenic Civil Code engaged in commercial, industrial, craft, farming or other business in the territory of Greece or in any other country of the European Economic Area and in Switzerland, in the context of which they do business on credit and they are considered to undertake the relevant financial risk, and, thus, it becomes necessary for them to check the solvency of their counterparties and, therefore, they have a clear legitimate interest in accessing the above file.

B. III. GRANTS ARCHIVE (Dec. 86/02 of the HDP A)

1. **Purpose of Processing:** The assessment, by the data recipients, of the creditworthiness of their counterparties.
 2. **Legal Basis of Processing:** Legitimate interest sought by the recipient of the data, granting agreement preparation and execution, compliance with legal obligations.
 3. **Data Categories:** The data contained in this file relates to information on credit risks borne by natural and legal persons (individuals, businesses regardless of legal form and size etc.) and financing of any kind by credit and financial institutions, including those resulting from settlement of debts in arrears. More specifically, data on paid debts and debts in arrears shall be recorded, in connection with:
 - a. Loans of any kind
 - b. Credits of any kind
 - c. Cards
 - d. Letters of guarantee (tender guarantees, performance guarantees, advance payment, timely payment, etc.) and
 - e. Letters of credit.
 4. **Data Sources:** Credit and Financial Institutions (Credit Companies, Leasing Companies, Factoring Companies and Card Issuance and Management Companies) and Loan and Credit Receivables Management Companies⁴ (hereinafter referred to as the Organizations) which are solely liable for the accuracy of the data.
 5. **Retention Period:** The above data shall be retained in the Archive for five (5) years from the last monthly update by the Organizations. More specifically, data relating to letters of guarantee and letters of credit shall be kept for five (5) years from the "closing" of the letter of guarantee or the credit letter.
 6. **Data Recipients :** File data is available for own use to the following recipients:
 - a. Bank of Greece.
 - b. Credit institutions.
 - c. Financial Institutions: Factoring, leasing and payment instruments management companies.
 - d. Credit companies.
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- e. Loan and Credit Receivables Management Companies.
- f. Public sector bodies with a clear public interest.

C. ARCHIVE OF LOST - STOLEN IDENTITY CARDS AND PASSPORTS (dec. 523/99, 25/04 and 11/2006 of the HDPa)

1. **Purpose of Processing:** The mitigation of fraud cases and the protection of citizens against the risk of banking agreements based on data from -lost/stolen identity card.
2. **Legal Basis of Processing:** Maintaining the vital interest of the data subject and fulfilling a duty performed in the public interest.
3. **Data Categories:** Citizens' statements on the theft, loss or replacement of identity cards and passports and lost/stolen/ inactive ID numbers, as well as lost/stolen passport numbers.
4. **Data Sources:** The data subjects (holders of police ID cards and passports) and the respective archive of the Ministry of Citizen Protection (formerly Ministry of Public Order).
5. **Retention Periods:** In view of the purpose of the processing served by the specific file, the retention period of the data is not subject to any time restrictions.
6. **Data Recipients:** File data is available for own use to the following recipients:
 - a. Bank of Greece.
 - b. Credit institutions.
 - c. Financial Institutions: Factoring, leasing and payment instruments management companies.
 - d. Credit companies.
 - e. Public sector bodies with a clear public interest.

D. ARCHIVE OF TERMINATED BUSINESS AGREEMENTS (Dec. 6/06 of the HDPa)

1. **Purpose of Processing:** Limiting fraud cases at locations where credit, debit or other cards are used, and ensuring a safer environment for these transactions.
2. **Legal Basis of Processing:** The legitimate interest pursued by the data recipient and the fulfillment of a duty performed in the public interest.
3. **Data Categories:** Data on contract termination between banks and businesses on the acceptance of credit cards, terminated for specific reasons, due to conduct which is contrary to contractual obligations or illegal conduct on the part of the business (for example, accepting stolen or counterfeit cards, virtual transactions, "breaking of transactions", etc.).
4. **Data Sources:** Credit Institutions and Card Issuing and Management Companies.
5. **Retention Periods:** The data is kept in the Archive for five (5) years.
6. **Data Recipients:** Archive data is made available for own use exclusively to the credit institutions and credit issuing and management companies responsible for concluding agreements with business for the acceptance of business cards.

E. ARCHIVE OF ASSIGNED RECEIVABLES ARISING FROM PUBLIC WORKS CONTRACTS EXECUTION/CERTIFICATION

1. **Purpose of Processing:** Protecting loyalty, reorganizing transactions, and mitigating fraud in bank transactions.
2. **Legal Basis of Processing:** The legitimate interest pursued by the data recipient and the fulfillment of a duty performed in the public interest.
3. **Data Categories:** Data on receivables against the Greek State, Legal Entities of Private Law, Local Administration Bodies etc, assigned to credit and financial institutions, arising from public works and/or certification of execution thereof, in whole or in part.
4. **Data Sources:** Credit institutions.
5. **Retention Periods:** The data is kept in the file for three (3) months from payment in full of the assigned claim.
6. **Data Recipients :** Archive data is made available for own use exclusively to the credit institution's departments responsible for the funding provided by the assignment of public works receivables and execution of such works.

F. COMPANIES DATA FILE FROM OGG AND GEMI

1. **Purpose of Processing:** To ensure the exercise of the right of information and financial freedom of the recipients and facilitating them to fulfill their obligations, by making available to them data published in OGG and GEMI.
2. **Legal Basis of Processing:** The legitimate interest of the recipient of the data: timely and accurate information on the identification of its counterparts and its valid establishment, operation and representation, and hence ensuring the safety of transactions.
3. **Data Categories:** Acts subject to publication, as well as information contained therein concerning the incorporation, establishment of a branch, conversion, merger, split, dissolution, revival and other

actions published as per above, including, by way of example, the sheet number and OGG date, the code number and registration date with GEMI, GEMI number, SA registration number and VAT number of the company, the legal form, company name, distinctive title and registered office, company share capital, number of members of the board of directors/partners, the term of office of the board of directors, as well as the members of the Boards of Directors, the managers and partners authorized to proceed with the publication, as well as the published annual financial statements of the companies (balance sheets etc.) TIRESIAS generates data of basic financial ratios and indexes based on the published financial statements.

4. **Data Sources:** The Official Government Gazette and GEMI.
5. **Retention Period:** The data concerning members of Boards of Directors, managers and partners is kept for ten (10) years from the publication of the relevant Official Government Gazette or the registration with GEMI.
6. **Data Recipients :** File data is available for own use to the following recipients:
 - a. Bank of Greece.
 - b. Credit institutions.
 - c. Financial Institutions: Factoring, leasing and payment instruments management companies.
 - d. Credit companies.
 - e. Public sector bodies with a clear public interest.
 - f. Traders - recipients of the Risk Control Archive (TSEK).

G. CREDITWORTHINESS BEHAVIOR RATING SYSTEM (SCORING)

1. **Purpose of Processing:** More accurate estimation of the credit risk assumed resulting in the reduction of bad debts.
2. **Legal Basis of Processing :** Legitimate interest sought by the recipient of the data, granting agreement preparation and monitoring, compliance with legal obligations.
3. **Data Categories:** Behavior scoring corresponding to a specific probability of default on a financial obligation over the next (12) months, based on the statistical valuation of past transactional behavior.

Scores shall be regularly reassessed and their algorithms shall be updated so that they are adjusted to the prevailing financial conditions and business practices and to verify the accuracy of the assessment.

4. **Data Sources:** Data of DOD and MPD Archives and in particular statistical models for analysis of past transactional behavior of natural and legal persons
5. **Retention Periods:** Scoring is generated at the time the request is made. It is dynamic and varies according to the data recorded in the records of the financial behavior of TIRESIAS SA.
6. **Data Recipients:** The TIRESIAS scoring system has been developed and operates by order of and on behalf of the credit and financial institutions, on the basis of the specifications agreed upon between banks, by working groups in which executors specialized in the assessment of credit risk participated. This system is addressed to credit and financial institutions which assess the scoring, and then issue a decision on whether or not to grant, taking into account the other information available to them and the granting policy they follow. As a result, it is noted that this scoring does not always entail the granting or nor granting of a loan or credit by a credit/financial institution/s to which you may have appealed or may appeal in the future, as each institution bases its decision on other data available to it (e.g. income) and its policy as well.

Indicative factors that may affect the above scoring are:

- Any delays in repayment of loan debts.
- The existence of data on default on financial obligations in the relevant file (DOD above under B.I.).
- Timely payment of loan debts.

H. DATA PROCESSORS

Access or access authorization (as the case may be) to all or part (as the case may be) of your personal data shall be granted to the following categories of associates who, under the relevant contracts, process your data in the name and on behalf of TIRESIAS.

- Consultancy and/ or IT development services companies for the development of new services
- Certified accountant companies for conducting audits
- Companies involved in the management (storage, destruction, etc) of a physical archive file in order for the management of applications submitted to us
- Computing centers for the hosting needs of our systems
- Courier companies for picking, transport, delivery of our mail

- Companies providing support and maintenance services for equipment, infrastructure, applications, software and information systems for meeting the relevant needs and for security checks (e.g. penetration tests).

By signing the relevant procurement contracts, every step is taken to ensure compliance of the processors with the data protection legislation.

I. BRIEF OVERVIEW OF TIRESIAS (BOT)

It provides stakeholders - businesses and businesses - with the possibility of online access to their data. The provision of data is effected through the issuance of a brief overview of TIRESIAS (BOT report), which records the data held at the time of issue in the Default Financial Obligations Files, Mortgage/Prenotation Data Files and the Credit Consolidation Systems of TIRESIAS related thereto, as they result from the combination of the details stated upon entering the system. The BOT report is issued after a unique T-Code is issued, different for each new transaction with the system.

The BOT report is not a substitute for the exercise of the right of access for the provision of data kept in the above records.

The BOT report and T-CODE report is subject to a fee. T_CODE has a validity period of 7 calendar days after its issue. Within that period, the same BOT report can be reproduced up to five (5) times. Each BOT report has a release time stamp.

The object of BOT is to immediately inform the stakeholders of data concerning them, without requiring their presence at the premises of TIRESIAS and profiling in connection with financial transactions, on the initiative of the data subject.

I. DATA PROTECTION OFFICER (DPO)

Our company has appointed a Data Protection Officer. You can contact him (Tel. +30 210 36.76.700, dpo@tiresias.gr, 2 Alamanas GR-151 25 Maroussi) .

IA. TRANSFER OF DATA TO A THIRD COUNTRY / ORGANIZATION

Transfer of data may be effected in accordance with relevant legislation, based on a decision on adequacy, appropriate safeguards or binding corporate rules. In the absence of the foregoing, the transfer may be effected if you provide your consent or if the transfer is necessary for the performance of a contract concluded between you and the data processor or concluded for your own benefit or for reasons of public interest or for establishing, exercising or supporting legal claims or to protect your vital interests.

L. DESTRUCTION OF THE PHYSICAL FILE OF APPLICATIONS

The physical file containing all applications submitted to TIRESIAS is kept in full security and is destroyed upon signing of the relevant protocol after 10 years.

M. EXERCISE OF DATA SUBJECTS' RIGHTS

You have the following rights:

(a) To know which of your personal data TIRESIAS maintains and processes, their origins, the purposes for which they are processed, and the period of their retention by file or as a whole (**right of access**). In addition to exercising your right of access, you may also be informed about the searches made about you by the recipients of our files during the last six months (number and source), including any activation of the alarm notification in case of entering or deletion of data. Finally, you may, by filing an application, request your score, as well as the factors which configured such score.

b) Request the correction and/or supplementation of your personal data so that it is complete and accurate (**right to rectification**). In this case, you must provide all necessary documents to show the need for correction or completion.

c) Request restriction of processing of your data (**right to restriction of processing**).

d) Refuse and/or object to any further processing of your personal data held by TIRESIAS (**right to object**).

e) Request the deletion of your personal data from the files kept by TIRESIA (**right to erasure or "right to be forgotten"**).

f) Request to transfer your personal data to any other processor of your choice in accordance with the terms of the General Data Protection Regulation (2016/679) (**right to data portability**).

In connection with the exercise of these rights, please note the following:

- TIRESIAS has in any event the right to refuse your request to restrict the processing or erasure of your personal data if the request is not sufficiently substantiated, if the processing or retention of the data is necessary in accordance with the law and for the establishment, exercising or supporting its legitimate rights. However, in any event, if you wish, Tiresias may cease the transfer of your data to all recipients of its files, henceforth transmitting the relevant indication (prohibition of transfer).
- The exercise of these rights acts for the future and does not concern data processing already performed.

g) File a complaint with the Hellenic Data Protection Authority (www.dpa.gr) if you believe that your rights are being infringed in any way (**right to file a complaint with the Authority**).

For the exercise of your rights, the Public Service Office operates on weekdays from 08:30 to 14:00 (Alamanas 1, 151 25 Marousi). On weekdays between 09:00 and 16:00 you may also reach a call center at 210 36.76.700. In addition, you may write to the Company to the above address of the Company or electronically to the e-mail address tires@tiresias.gr, while useful information on the exercise of the above rights is provided on the website of TIRESIAS <http://www.tiresias.gr>.

TIRESIAS will respond to your request within thirty (30) days of its submission except in exceptional circumstances, in which case the above deadline may be extended for up to sixty (60) additional days if deemed necessary, taking into account the complexity of the request and/or the number of requests. In any event, TIRESIAS will inform you of any extension of the deadline as per above.

N. PRIVACY

TIRESIAS applies a physical security system and information security management system to ensure the privacy of your personal data and their protection against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access and any other form of unlawful processing. By way of example:

- The building in which the computer center is housed is guarded by security personnel who records the incoming persons, while there is a closed TV circuit covering the entrance and the perimeter. At the same time, access to crucial sites requires the use of a card and access rights.
- it takes the appropriate technical and organizational measures to ensure the safety of personal data (ensuring confidentiality, integrity and availability) from planning and by definition,
- it owns and applies procedures and systems to ensure the privacy of your personal data and their protection against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access and any other form of unlawful processing e.g.
 - using access control tools,
 - use of data loss prevention tool,
 - protection against virus software,
 - back up procedures,
 - keeping user logs (users, administrators, database, operating),
 - strict control of access to its systems by both internal and external users,
 - private network use, etc.
- has informed the data subjects (citizens and employees) in accordance with Regulation (EU) 2016/679 (GDPR),
- it respects the principle of minimizing personal data,
- it ensures the exercise and satisfaction of the rights of the subjects,
- it has prepared documents, policies and procedures that demonstrate its compliance with the privacy policy, cookies policy, registration of the kind, categories and flows of personal data, processing of records, impact assessment, etc), as referred to in the GDPR,
- it has appointed a Data Protection Officer and has established a team for the protection of personal data,
- it ensures training and raising awareness for employees with regard to the protection of personal data
- it modifies the cooperation agreements with data processors, in accordance with the provisions of Article 28 of the GDPR, aiming at the absolute compliance of the latter.