

PRIVACY POLICY FOR VISITORS AND WEBSITE USERS

Data Controller

The company under the corporate name "Bank Information Systems S.A." and the distinctive title "TIRESIAS S.A." ('the Company'), which is based in Marousi, Alamanas 2 Street, P.C. 151 25, tel. 210 63.82.200, e-mail cust_support@tiresias.gr processes personal data of partners - suppliers - customers and visitors of its website.

This policy, hereinafter the "Policy", refers to the conditions of the collection, storage and use of your personal data by the Company, while visiting and using the services of the website <http://www.tiresias.gr>, and may occasionally be changed/updated.

When we collect your personal data?

Your data is collected while browsing or using the website www.tiresias.gr.

What categories of personal data do we collect?

We record your IP address as well as the user-id – for users who are logged in. Also, when the user logs in, we record the time of connection (but not the time of disconnection), and the browser used.

What is the purpose of processing your personal data?

We process your personal data:

- A. for purposes of browsing, for the proper functionality of the website and facilitation of navigation;
- B. for purposes of protecting the website, our information systems, any kind of data we retain, and maintaining availability of our services from accidental or malicious actions;
- C. for the purpose of investigating incidents of cyberattacks and malfunctions;
- D. for the purpose of supporting any of our arising legal claims;

Legal Grounds for Processing Data

We process the above personal data to safeguard our legitimate interests (art.6 par.1 case f GDPR) and particularly to protect our website, our information systems, our provided services and to defend our legal claims. In this case, our legitimate interests override the interests and fundamental rights and freedoms of our website's visitors and users, due to the major purposes served by Tiresias SA's services and archives. In order to safeguard subjects' interests and fundamental rights, the categories of personal data and the retention period have been minimized.

Who do we share your personal data with? Where is it stored?

Your data is stored in Greece and not transferred to third parties, while it is processed by our authorized staff, committed to maintaining their confidentiality, integrity and availability.

Processing principles and security measures

Our Company, indicatively and not restrictively:

- processes only your personal data that is necessary to fulfil the aforementioned purposes and only for those purposes;

- implements appropriate technical and organisational measures for the security of personal data (ensuring confidentiality, integrity and availability) by design and by default;
- implements procedures and systems for the confidentiality of the processing of personal data, as well as for their protection from accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access and any other form of unlawful processing (e.g. use of tools for access controls and data loss prevention),
- informs the data subjects (citizens and employees), in accordance with the Regulation (EU) 2016/679 (GDPR),
- respects the principle of personal data minimisation;
- ensures the exercise and satisfaction of the rights of the subjects,
- has drafted documents, policies and procedures demonstrating its compliance with the principle of accountability (privacy policy, policy cookies, recording of the type, categories and flows of personal data, compilation of processing records, impact assessment, etc.), as referred to in the GDPR,
- has appointed a Data Protection Officer and set up a group for the protection of personal data,
- educates and raises awareness among its employees regarding the protection of personal data;
- amends its cooperation agreements with processors on its behalf, in accordance with Article 28 of the GDPR, ensuring that processors are fully GDPR compliant as well.

How long do we keep your personal data?

The above data is kept for a period of 31 days and in case of malicious attack, they may be communicated to the competent authorities for investigation. In this case, they will be maintained for the time necessary to support our legal claims.

What are your rights? How to you exercise them?

You have the following rights:

- a) Be informed when we collect and process your personal data, data sources, the purposes of processing it, its retention period and request a copy of any personal data we hold that concerns you (**right of access**).
- b) Request the correction and/or completion of your personal data in order to be complete and accurate (**right of rectification**). You should provide us with any necessary document substantiating the need to rectify the inaccurate or incomplete data.
- c) Request the restriction of processing your personal data (**right to restrict processing**).
- d) Refuse and/or object to the processing of your personal data that we keep (**right to object**).
- e) Request the transfer of your personal data that we keep to any other controller of your choice in a safe and secure way, without affecting its usability (**right to data portability**).
- f) Request the deletion of your personal data from the files we keep for example when your data is no longer necessary or unlawfully processed or no longer meets one of the abovementioned lawful grounds (**right to be forgotten**).

With regards to the exercise of your above rights, please note that:

- The Company has in any case the right to refuse the satisfaction of your request to limit the processing or erasure of your personal data or your objection to the

- processing, if the processing or retention of the data is necessary for the establishment, exercise or defence of its legal rights or the fulfilment of its obligations.
- The exercise of the right to portability does not imply the deletion of your data from our records, which is subject to the terms of the immediately preceding paragraph and the conditions of the Rules of Procedure.
 - The results from the exercise of these rights have effect for the future and does not concern any data processing already carried out.
- g) Lodge a complaint with the Hellenic Data Protection Authority (<http://www.dpa.gr>) if you consider that your rights are being violated in any way (**right to complain to the Authority**).

For the exercise of the above rights you may address in writing to the Company's address (Alamanas 2, Marousi, 151 25), or electronically to the e-mail address apanopoul@tiresias.gr or by phone at 210 63 82 252, and in any case you may also contact the Company's Data Protection Officer at dpo@tiresias.gr address.

When do we respond to your Requests?

We respond to your Requests free of charge without any delay, and in any case within one (1) month from the time we receive your request. However, if your Request is complex or there is a large number of your Requests, we will inform you within the month if we need to receive an extension of another two (2) months within which we will respond to you.

If your Requests are manifestly unfounded or excessive, in particular due to their repetitive nature, the company may impose a reasonable fee, taking into account the administrative costs for the provision of the information or the execution of the requested action, or refuse to act on the Request.

Who can you contact for the progress of your Requests?

For more information you can call during working days and hours at +302103676700 (Customer Service Phone Line).

Do we use automated decision-making, including profiling, when processing your Data?

We do not make decisions or profiling based on automated processing of your Data.

What is the applicable law when processing your Data?

We process your Data in accordance with the General Regulation on the Protection of Personal Data 2016/679/EU, and in general, with the applicable national and European legislative and regulatory framework for the protection of personal data (Law 4624/2019, Law 3471/2006).

Data Protection Officer (DPO)

The Company has appointed a Data Protection Officer in accordance with Art. 37 of the General Data Protection Regulation (tel. +30210 36.76.700, dpo@tiresias.gr, Alamanas 2 151 25 Marousi).