GENERAL DATA PROTECTION POLICY
in accordance with Article 14 of Regulation (EU) 2016/679 (General Data Protection Regulation)

This policy lays down the principles applied by TIRESIAS when processing data (categories, legal basis, purpose, protection measures, rights, etc.) and seeks to inform data subjects about processing. It is posted on our Company's sites (http://www.tiresias.gr and https://tsek.teiresias.gr) and may be changed/updated from time to time.

WHAT ARE PERSONAL DATA?
Any information relating to an identified or identifiable natural person (data subject).

PROCESSING
Any operation or set of operations, whether or not done by automated means, carried out on personal data or on sets of personal data, ranging from collection, storage, erasure or destruction to anonymisation thereof.

CONTROLLER
The company with the corporate name BANK INFORMATION SYSTEMS S.A., trading as TIRESIAS S.A. (controller) whose registered offices are at 2 Alamanas St., Maroussi GR-15125, Tel. 210-36.76.700), keeps the following records:

A. REFERENCE FILE

1. **Purpose of processing**: To ensure that the natural (and legal) persons in the files (hereinafter Economic Operators) can be precisely identified and to correctly correlate the data in TIRESIAS files with the natural (and legal) person they relate to.

2. **Legal basis of processing:** Compliance with a legal obligation, namely keeping a complete, up-to-date and accurate data file (Article 6 (1) (C) of the GDPR).

3. **Data Categories**: Information relating to the identification of natural persons (and legal persons) and in particular their Tax Reg. No. and ID Card or military ID or passport No., their name-surname and father's name or corporate name/trade name, , addresses (street, number, area, postcode) and General Commercial Register No.

In addition, the following information is kept in the Reference File, without being transmitted to the recipients:
- for natural persons, gender and date of birth
- for legal persons, the year of establishment, economic activity code and status of the company (such as active, inactive, etc.).

4. **Data Sources**: The data in the reference file initially came from the Tax Reg. No. file for the 1992 financial year which was held by the then Ministry of Finance IT Centre which was provided to TIRESIAS by the Ministry of Finance. Since then the reference file has been constantly updated and enriched with additional or more recent data (Tax Reg. No., ID Card No., addresses, etc.) from the Taxpayers Register held by the Independent Authority for Public Revenue pursuant to Article 17(1)(o) of Law 4174/2013 (Tax Procedure Code) inserted by Article 52(1) of Law 4569/2018 (once interconnection is completed), from the

printed or electronic records of the raw data input to the relevant Economic Operators (banks, courts, cadastre, etc.), from the GCRand from the applications submitted to TIRESIAS by data subjects.

With regard to the records or electronic documents that include primary data, the data concerning the identification of a natural or a legal person is correlated with the data of the Reference File, in order to be identified and then entered into the File, as appropriate. In case the details of a natural or legal person do not exist in the Reference File or do not match the details of this File, data is entered as a new Economic Operator enriching the Reference File.

5. **Retention period**: In light of this processing purpose which the reference file serves, the data is held there without any time limit.

6. **Data recipients**: legal recipients of TEIRESIAS files, as described below .

B. ECONOMIC BEHAVIOUR DATA FILES

B.i. Default Financial Obligation System (DFO) – Mortgages and Mortgage Prenotations System (MPS) (Decision 109/99, Law 3816/2010 and HDPA[1] Decision 24/04)

1. **Purpose of Processing:** I. Data on economic behaviour and defaulting on financial obligations - to protect commercial credit and restructure financial transactions by allowing data recipients to evaluate the solvency of their counterparties.
   II. Data on economic behaviour and mortgages – mortgage prenotations – to protect commercial credit and restructure transactions by informing data recipients about in rem encumbrances on the real estate of debtors and the consequent ability to obtain in rem collateral to secure themselves against the credit risk they have assumed.

2. **Legal basis of Processing:** The legitimate interest which the recipient of the data seeks to achieve. The legitimate interest consists in the evaluation of the credit risk that is to be undertaken or has already been undertaken. The legitimate interest obviously takes precedence over the rights of the subjects, in accordance with the HDPA decision No 109/1999 (24/2004), while at the same time it is a legal obligation for credit and financial institutions .

3. **Data Categories**: Data on default of specific financial obligations which are highly objective and relate to:

3. 1. Default Financial Obligations Data
   a. Bounced cheques.
   b. Bills of exchange and notes to order unpaid at maturity
   c. Bankruptcy petitions filed (Law 3588/2007, Law 4738/2020).
   d. Decisions rejecting bankruptcy petitions (Article 6 (2) of Law 3588/2007, Article 77 (4) of Law 4738/2020, Article 178 (1) of Law 4738/2020).
   e. Bankruptcy orders issued (Law 3588/2007, Law 4738/2020).
   f. Payment orders (including delayed rent payment orders).
   g. Auctions of real estate.

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[1]Hellenic Data Protection Authority

h. Auctions of moveable items.
i. Conversions of mortgage prenotations
j. Seizures and orders under Legislative Decree 17.7/13.8.1923 on special provisions for societes anonymes
k. Termination of card agreements due to anti-contractual use or failure to keep up with card repayments.
l. Termination of consumer, housing and business loan agreements due to default.
m. Administrative sanctions imposed by the Ministry of Finance against persons infringing tax laws to safeguard the interests of the State.
n. Applications for resolution decisions (Articles 99 et seq. of Law 3588/2007 and Article 31 et seq. of Law 4738/2020).
o. Applications for judicial debt repayment arrangements (Article 4(1) of Law 3869/2010).
p. Decisions on judicial debt repayment arrangements (Article 8 of Law 3869/2010).
q. Orders for hand back of use of a leased property.

3. 2. Economic behaviour data on mortgages - mortgage prenotations
a. Mortgages
b. Mortgage prenotations.

4. Data Sources:
This data is collected from the following sources:

a. data in points 3.1(a), (b), (k), (l), (o) and (p): Credit and financing institutions (as appropriate) (credit providers, leasing companies, factoring companies, card issuer/management companies, loan and credit claims management companies, payment and e-money institutions - as long as they provide credit-microcredit providers).
b. data in points 3.1(c), (d), (e), (f), (h), (o), (p) and (q): From the Courts of the Peace.
c. data in points 1(g) and (h): from the EFKA-TAN Fund auction website and e-auction website.
d. data in points 1(c), (d), (e), (f), (n) and (q): from the Courts of First Instance.
e. data in point 1f: From the Administrative Courts of Appeal.
f. data in points 1(i), (j) and 2(a) and (b): From Land Registries and Cadastral Offices.
g. data in point 1m: from the Ministry of Finance via the Bank of Greece.
h. data in points (c), (d) and (e): from the Online Solvency Register.

5. Retention period:
5.1 Special rules per data category
a. Data about bounced cheques, unpaid bills of exchange at maturity, notes to order and terminations of card and loan agreements shall be retained for 2 years.
The above data is deleted from the File if the entire debt has been paid (namely all data which exists in the default file, excluding leased property hand-back orders) and the time period specified for **all data in the specific category** has elapsed.
Data concerning terminations of loan and card agreements that are marked 'refinancing' or 'final settlement' are deleted in accordance with the above, provided that the means used to refinance / settle them (cheques, new loans, etc.) are paid off.
b. Data about payment orders is retained for 3 years.
c. Data about auctions, seizures and payment orders under Legislative Decree 17.7/13.8.1923 is retained for 4 years.
d. Data about administrative sanctions of the Ministry of Finance is retained for 4 years.

The data referred to in paragraphs b, c and d above is deleted from the File where the entire debt has been settled (namely all amounts in the default file, excluding leased property hand-back orders, has been paid: see point (i) below) and the specified time period for **all data entered in the file** has elapsed.

e. Data about bankruptcy petitions are deleted either when the declaration of bankruptcy is registered or, where the relevant hearing is cancelled, after 12 months from the date of the (cancelled) hearing, and in all events are deleted in the month in which 5 years have elapsed from the date on which they were filed with the competent court. Where the application for bankruptcy is rejected because the debtor's assets are not adequate, the relevant data are entered in the file and retained in the file for 10 years.

f. Data about applications for /resolution – including applications for (immediate) ratification of the resolution agreement and inclusion in special liquidation while remaining in operation– are deleted from the file after the passage of 5 years from the date on which they were submitted to the competent court, unless a decision confirming the agreement is issued, in which case the data about the application and ratification of the agreement are kept on file for a period of 5 years from the expiry of the agreement's effective term. If a decision rejecting ratification of the resolution agreement is issued, the information about the application and the relevant court ruling are kept on file for 5 years from the date on which that decision was handed down. If a decision is issued declaring that the procedure ended due to failure to reach agreement (e.g., if the deadline for reaching agreement elapses without action having been taken, renunciation thereof by the mediator), the data about the application and the relevant decision are kept on file for 5 years from the date on which the application was lodged with the competent court. Lastly, where a decision is issued to place an undertaking in special liquidation while allowing it to remain in operation or where an agreement is declared to be terminated, where a resolution agreement is terminated, a condition subsequent contained in the resolution agreement is met, a resolution agreement is annulled, and in cases where the duration of the /resolution agreement is not specified, the data about the relevant application and decision are kept on file for 10 years from the date on which the application was lodged with the competent court.

g. Data about declared bankruptcies are deleted after the passage of 10 years where bankruptcy-related tasks are not continued and in all events after the passage of 15 years from the date on which bankruptcy was declared. Likewise, data about applications and decisions to ratify /resolution agreements are also deleted in all events after the passage of 15 years.

h. Data about mortgage prenotations, mortgages and conversions of mortgage prenotations into mortgages are deleted from the File when removed from the relevant public registers.

i. Applications for judicial debt repayment arrangements are, where arrangements are made in the context of those debts under Articles 5 and 7 of Law 3869/2010 as in force, kept on file for a period of 3 years from payment of the relevant debts. Where the above applications do not result in a debt repayment arrangement, they are deleted from the file 3 years after the date of the hearing. Where the applicant discontinues the application, the data relating to the application are deleted from the file 1 year after the application was submitted.

Decisions about judicial debt repayment arrangements are kept on file for a period of 3 years from occurrence of the release from debts in accordance with the first subparagraph of Article 11(1) of Law 3869/2010. Decisions on full release of the debtor (Article 8(5) of Law 3869/2010) and decisions declaring debtors in forfeit of the contract are also retained for 3 years.

j. Orders for hand back of use of a leased property are kept on file for 3 years from publication, after which they are deleted in all events.

5.2. General rules on retention periods for all DFO data:
- In all events, the data in categories (a) to (d) and (i) are deleted after the elapse of 10 years. Data on administrative sanctions that have not been lifted are excluded; such data are deleted after the sanctions have been lifted.
- Data relating to bounced cheques, unpaid bills of exchange, notes to order, terminations of card and loan agreements, payment orders, auction schedules, seizure orders, orders under Legislative Decree 1923, conversions of mortgage prenotations, petitions for bankruptcy and orders for hand back use of leased properties, where they do not exceed € 1,000.00 in total, are not be transmitted. This provision does not apply where the DFO system contains data about a petition for bankruptcy without any amount, a declared bankruptcy or an administrative sanction of the Ministry of Finance or a petition/decision about /resolution, petition for judicial debt repayment arrangements or court ruling on judicial debt repayment arrangements or for an auction marked 'go ahead' but for which no amount is indicated.
The non-transmitted data reappear if new data are entered which result in the € 1,000.00 threshold being exceeded.
- The above data concerning amounts which are proven to have been paid, provided that they do not exceed € 3,000 in total and do not exceed 3 items of data, do not appear in the transmitted information file but reappear if new data are entered which cause any of the above thresholds to be exceeded or where the above amounts have not been paid.

6. **Data recipients**: The data in the files are available for own use to the following recipients:
   a. Bank of Greece.
   b. Credit institutions.
   c. Financial Institutions[2]: factoring companies, leasing companies, card issuing/management companies, credit providers, loan and credit claims management companies, payment institutions, e-money institutions and microcredit providers.
   d. Public sector bodies whose legitimate interest is clear.

B.II. TIRESIAS RISK CHECKING SYSTEM (TSEK) (HDPA Decision No. 186/2014)
1. **Purpose of processing:** To safeguard commercial credit, reliability, the security of transactions and the exercise of the rights of economic freedom and the freedom to provide information to businesses by allowing businesspeople to assess the solvency of their counterparties.

2. **Legal basis of processing:** The legitimate interest which the recipient of the data pursues (and in particular the restriction on the credit risk he assumes), the security of transactions, economic freedom and freedom of information.

3. **Data Categories**: The following data from the DFO and MPS:
   - Bounced cheques
   - Bills of exchange and notes to order unpaid at maturity
   - - Applications for bankruptcy (Greek Law No 3588/2007 and 4738/2020) – judgements rejecting bankruptcy applications because the debtor does not have sufficient

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[2]Where they provide credit

assets(Article 6 (2) of Law 3588/2007, Article 77 (4) of Law 4738/2020, Article 178 (1) of Law 4738/2020).

- Applications for /resolution decisions (Articles 99 et seq. Bankruptcy Code and Article 31 et of Law 4738/2020).
- Declared bankruptcies (Greek Law No 3588/2007 and 4738/2020)
- Payment orders & leased property hand-back orders
- Auctions of real estate.
- Auctions of moveable items.
- Mortgages and mortgage prenotations
- Mortgage prenotations converted to mortgages
- Seizure of real estate properties and registration of payment orders under Legislative Decree 17.7/13.8.1923.
- Applications and decisions for judicial debt repayment arrangements under Law 3869/2010.

Data about companies obtained:
- from the Government Gazette and the GCR are also provided (see point (F) below),
- balance sheets, financial ratios and sector financial indicators

4. **Data Sources**: The points made in paragraphs B – I and 4 above (as appropriate), the Government Gazette and the General Commercial Register.

5. **Retention period:** The periods indicated in points B – I and 5 above (for DFO-MPS data) and point F below (for data from the Government Gazette and the General Commercial Register) apply.

6. **Data recipients:** The TSEK data is provided for own use to natural or legal persons or associations of persons within the meaning of the Hellenic Civil Code who engage in commercial, industrial, handicrafts, agricultural or other business in the Greek State or in another country of the European Economic Area and Switzerland, in the context of which they do business on credit and consequently undertake (or will undertake) the corresponding credit risk and consequently it is necessary to check the creditworthiness of their counterparties, after being informed about this.

B. III. CREDIT CONSOLIDATION SYSTEM (CCS) (HDPA Decision No. 86/02)

1. **Purpose of processing:** To allow recipients of the data to assess the creditworthiness of their counterparties.

2. **Legal basis of processing:** The legitimate interest pursued by the data recipient, which consists in the assessment of creditworthiness for the preparation and conclusion of contracts under which credit risks are assumed. The legitimate interest overrides the rights of data subjects as it contributes to the avoidance of over-indebtedness of borrowers, and compliance with legal obligations.

3. **Data Categories**: The data in this file relates to information about credit risks assumed by natural and legal persons from all manner of financing including those that arise in the context of the implementation of laws on the regulation of debts such as Law No 3816/2010, Law No 3869/2010, Law No 4161/2013, Law No 4307/2014 etc. or relevant

decisions of the Bank of Greece e.g. No 102/2016 already No 175/2020). More specifically, data are recorded about debts arising from:

a. All types of loans
b. All manner of credit extended
c. Cards
d. Guarantee letters (participation bonds, performance bonds, advance payment bonds, timely payment bonds, etc.) and
e. Documentary Credit

4. **Data Sources**: Credit institutions, credit, leasing, factoring companies, card issuing/management companies, loan and credit claims management companies, payment institutions, e-money institutions and the Public Works Engineers - Contractors Fund, microcredit providers (hereinafter agencies) who are exclusively responsible for the accuracy of the data.

5. **Retention period:** The data are retained in the file for 5 years from the last date on which they were updated by the Operator, whether sent in electronic format by the Operator or submitted by the party concerned in hard copy as a certificate from the latter. Where the balance owed has been paid in full, the data under the name of the guarantor are deleted. Data relating to guarantee letters and documentary credit in particular are kept on file for 5 years from forfeiture / non-payment of the guarantee letter or documentary credit respectively. In the case of timely payment, the data are automatically deleted.

6. **Data recipients**: The data in the file are available for own use to the following recipients:
a. Bank of Greece.
b. Credit institutions.
c. Financial Institutions[3]: factoring companies, leasing companies, card issuing/management companies, credit providers, payment institutions, e-money institutions (as long as they provide credit), loan and credit claims management companies, the Public Works Engineers - Contractors Fund, and microcredit providers.
d. Public sector bodies whose legitimate interest is clear.

C. ARCHIVE OF LOST - STOLEN IDENTIFICATION DOCUMENTS AND RECORDS (HDPA Decisions No. 523/99, 25/04 and 11/2006).

1. **Purpose of processing**: In order to limit fraud and protect citizens from any unlawful acts against them using ID cards or passports, which have been stolen or lost or replaced, TIRESIAS keeps a file which records reports filed by citizens about theft or loss of ID cards or passports. This is an ancillary file and the data entered in it -as with other TIRESIAS files- is freely evaluated by the recipient. This means that entry of the data does not entail any commitment or obligation on the part of TIRESIAS or the recipients listed below.

2. **Legal basis of processing:** Tiresias' legitimate interest in the creation of a File lies in the protection of traders and dealing with bank fraud (the conclusion of contracts with identified counterparties) as well as compliance by credit and financial institutions with the relevant legal obligation (know your customer), the protection of the vital interests of the data subject and the fulfilment of a duty performed in the public interest.

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[3]Where they provide credit

3. **Data Categories**: Reports filed by citizens about theft, loss or replacement of ID cards and passports and the numbers of them.

4. **Data Sources**: Data subjects themselves (holders of police ID cards and passports) and the relevant Ministry of Citizen Protection file.

5. **Retention period:** In light of the processing purpose which the specific file serves, the data is held there without any time limit.

6. **Data recipients:** The data in the file are available for own use to the following recipients:[4]
   a. Bank of Greece.
   b. Credit institutions.
   c. Financial Institutions: factoring companies, leasing companies, payment instrument issuing/management companies, credit providers, loan and credit claims management companies, payment institutions, e-money institutions and microcredit providers.
   d. Public sector bodies whose legitimate interest is clear.

D. TERMINATED COMMERCIAL BUSINESS CONTRACTS FILE (HDPA Decision No. 6/2006)

1. **Purpose of processing**: To limit fraud at transaction points involving the use of credit, debit or other cards and to ensure a safer environment for such transactions.

2. **Legal basis of processing:** The legitimate interest pursued by the recipient of the data to ensure a secure environment for its customers - cardholders to use their cards and the fulfilment of their obligation towards international card organisations (e.g., VISA, MASTERCARD, etc.).

3. **Data Categories:** Data about terminations of credit card acquisition contracts between Banks, Card Issuing and Management Companies, Payment Institutions, Electronic Money Institutions and merchants are posted for specific reasons. These relate to anti-contractual or unlawful conduct by merchants (such as acceptance of stolen or counterfeited cards, sham transactions, "transaction splitting", etc.). The data (name-surname, father's name, ID Card No., Tax Reg. No., full address) of the merchant's representatives (up to 4) are entered in the file and no data about card transactions and cardholders are recorded.

4. **Data Sources:** Credit institutions, card issuing/management companies, payment institutions and electronic money institutions

5. **Retention period:** Data are kept in the File for 5 years from the date of termination.

6. **Data recipients:** The data in the file are available for own use only by the departments of credit institutions, companies issuing/managing payment instruments, payment institutions and e-money institutions which are responsible for concluding card acquisition agreements with merchants.

E. FILE OF ASSIGNED CLAIMS ARISING FROM CONTRACTS/CERTIFICATES OF PERFORMANCE FOR PUBLIC PROCUREMENT CONTRACTS

1. **Purpose of processing:** To protect credit, restructure transactions and limit fraud in banking transactions.

2. **Legal basis of processing:** The legitimate interest pursued by the recipient of the data, and in particular the transferee, in the assignment to him of real and legitimate claims.

3. **Data Categories:** Data are recorded about claims against the Greek State, bodies governed by public law, local government authorities assigned to credit and financial institutions, deriving from public works contracts and/or certificates of performance of such contracts, in whole or in part.

4. **Data Sources:** Credit Institutions.

5. **Retention period**: The data are kept on file for 3 months from full payment of the assigned claim.

6. **Data recipients:** The data in the file are made available for own use only to the departments of credit institutions responsible for financing secured by assignments of claims arising from public works.

F. FILE OF COMPANY DATA FROM THE GOVERNMENT GAZETTE AND GENERAL COMMERCIAL REGISTER

1. **Purpose of processing:** To ensure the exercise of the rights of free information and the economic freedom of recipients and to facilitate them in discharging their obligations by making available to them data published in the Government Gazette and the General Commercial Register.

2. **Legal basis of processing:** The legitimate interest which the recipient of the data pursues: timely, easy and accurate information to identify counterparties of legal persons and in general associations of persons and validly establish, operate and represent them, and consequently the security of transactions.

3. **Data Categories:** Deeds required to be published and the published particulars of companies relating to the incorporation, establishment of a branch of foreign companies, amendment of the Articles of Association, conversion, merger, spin-off, winding up, revival and other decisions published in accordance with the above, which include the issue number and date of the Government Gazette (for previous publications prior to the coming into existence of the General Commercial Register), the code number (GCR) and the date of entry in the GCR, the GCR number, the Companies Reg. No. and the company Tax Reg. No., the economic activity code, the type of company, its corporate name, trading name and registered offices, the number of shares, the number of members of the Board of Directors/partners, the term in office of the Board and the members of the Board of Directors, the administrators and partners of legal person who in law make the same publications, their stake in the company's share capital and the published annual financial statements of companies (balance sheets, etc.). TIRESIAS generates key financial data and indicators based on the published financial statements.

4. **Data Sources:** The Government Gazette and the GCR.

5. **Retention period:** Data relating to members of the Board of Directors, administrators and partners are retained for 10 years from publication of the relevant Government Gazette or entry in the GCR, while the rest of the data relating to legal persons are retained without time limit.

6. **Data recipients**: The data in the file are available for own use to the following recipients:
   a. Bank of Greece.
   b. Credit institutions.
   c. Financial Institutions: factoring companies, leasing companies, card issuing and management companies, credit providers, payment institutions, e-money institutions, loan and credit claims management companies and microcredit providers.
   d. Public sector bodies whose legitimate interest is clear.
   e. Businessmen - recipients of the Risk Checking System (TSEK).

G. AUCTION PUBLICATIONS WEBSITE DATA FILE

1. **Purpose of processing:** To facilitate daily monitoring of auction publications and court judgments posted on the EFKA-TAN website.

2. **Legal basis for processing:** The legitimate interest which the recipient of the data pursues: ensuring easy, accurate information about the data published on the EFKA-TAN website

3. **Data Categories:** The data posted on the EFKA-TAN website relating to new auction notices and court judgments relating to the sale of moveable and immoveable property, alterations (changes or deletions) to older postings, descriptions and valuations of properties, including the file in image format (pdf) accompanying the relevant posts.

4. **Data Sources:** The data are taken from the auction publications website of the Judicial Publications Bulletin of the EFKA-TAN Fund (former Jurists Fund)(https://deltio.tnomik.gr/) and eauction.gr.

5. **Retention period:** Data is retained for two (2) years from the date of its publication on the website.

6. **Data recipients**: The recipients of these data are credit and financial institutions (factoring companies, leasing companies, companies issuing/managing payment instruments, credit providers, payment institutions, e-money institutions, loan and credit claims management companies and microcredit providers). Data may be provided as an aggregated file on a daily basis to recipients who request it.

H. CREDIT SCORING SYSTEM

1. **Purpose of processing**: To enable a comprehensive and more accurate assessment of the credit risks being assumed or already assumed, an assessment of the likelihood of default, recovery or deterioration in the credit behaviour and consequently a reduction in bad debt.

2. **Legal basis of processing:** The legitimate interest which the recipient of data pursues in entering into and monitoring contracts under which credit risks are assumed, limitation of such risks as well as the risk of over-borrowing, as well as compliance with the relevant legal obligations.

3. **Data Categories**: Behaviour scoring based on statistical processing models which calculate the score based on the statistical valuation of past trading behaviour.

These models estimate:

A) the likelihood of default on a financial liability over the next 12 months on the TIRESIAS system which is matched on a numerical scale from 1, which is the worst-case value, to 600.

B) the likelihood of recovery over the next 12 months, which is reflected on a recovery scale with D as the lowest level and AA the highest.

C) the likelihood of deterioration during the next 3 months, which is shown on a scale from F, which is the worst-case value, to A.

The statistical models used to process and calculate the scores are regularly re-evaluated and their algorithms are updated so that (a) they can be adjusted to prevailing economic conditions and business practices and (b) the accuracy of the estimates can be confirmed.

The grading of each Economic Operator is calculated either automatically and archived on a monthly basis for all the Economic Operators of the File (as a necessary preparation for the provision of parametric services to the recipients, e.g. Red reports, Economic Operator' Score, etc. regarding changes in grading) it is calculated and archived whenever a recipient creates a request. In the automatic communication system (via MQ) the grading is calculated when the relevant request of the recipient is submitted for a specific Economic Operator.

Each rating is accompanied by the 3 main reasons for its formation, while in some cases it is not possible to calculate the score.

Indicative factors which could affect the score are:
• The existence of delays in repaying loans.
• The existence of data on breach of financial obligations in the relevant file (DFO, see above under B.I.3.1.).
• Consistency in payment of loan debts.

4. **Data Sources**: Data from the DFO, MPS and CCS files which are processed using specific statistical models to analyse the past transactional behaviour of natural and legal persons.

5. **Retention period:**. The score calculated is retained for 2 years (on a rolling basis).

6. **Data recipients:** TIRESIAS' Credit Behaviour Scoring System was developed and operates on the orders of and on behalf of credit and financial institutions based on specifications agreed at interbank level by working groups attended by specialist bank credit risk assessment units. Only credit and financial institutions[5] (factoring companies, leasing companies, card issuing and management companies, credit providers, payment institutions, e-money institutions and loan and credit claims management companies and microcredit providers) are recipients of the system and evaluate the score by taking a decision on whether to grant financing (initial or refinancing) or not, in conjunction with other information they have (e.g. income, property, occupation, etc.) and the lending / refinancing / debt repayment policy they follow in accordance to Article 22 (2) (A) of the GDPR.

Note that the specific scoring and profiling in each case does not entail the granting or otherwise of a loan or credit by the credit or financial institution(s) since each of them decides based on other data it has (such as income, etc.) and the policy it has in place.

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[5]Where they provide credit

Recipients may provide data related to the Credit Rating (Score) of their customers, after processing based on specific processing criteria and only if they have a legitimate interest. The result of the processing is transferred to the credit or financial institution that requested the processing, in an encrypted File (Batch) via email. The files sent above are retained for a period of two (2) years from their creation.

I. EXCHANGE OF DATA WITH EUROPEAN CREDIT INFORMATION SUPPLIERS

As a credit information supplier, TIRESIAS is a member of the Association of Consumer Credit Information Suppliers (ACCIS).

In the context of bilateral agreements between ACCIS members, credit and financial institutions are given the opportunity to obtain economic behaviour data from foreign credit information suppliers.

In order to search for and use the data of the European credit information supplier, the financial institution must have obtained the prior express written consent of the persons to whom that data relates. Cross-border data exchange between credit information suppliers is only done within the EU on the basis on the GDPR.

1. **Purpose of processing:** To evaluate the creditworthiness and solvency of the data subjects.

2. **Legal basis of processing:** Data are sent based on data subjects' consent.

3. **Data Categories:** Request from recipient, data of DFO/MPS CCS data, Score, reference file data, in accordance with the bilateral agreement with the respective European Credit Information Supplier, based on the principle of reciprocity.

4. **Data Sources:** European Credit Information Suppliers within whose territory the data subject resides and/or operates.

5. **Retention period:** One year in the context of the principle of accountability and based on the bilateral agreement between Tiresias and the respective European Credit Information Supplier.

6. **Data recipients:** credit institutions, factoring companies, leasing companies via a Greek credit information supplier.

J. GUARANTEE LETTER VALIDITY CHECKS

The recipient is given the option to check the validity of a guarantee letter and/or whether it has been forfeited. In order to obtain the relevant information, it is necessary for the number of the guarantee letter being checked to be filled out and the issue date or amount is also required.

1. **Purpose of processing:** The purpose of such processing is to limit and prevent fraud by allowing recipients to check the validity of a guarantee letter.

2. **Legal basis of processing:** The legitimate interest pursued by the recipient of the data, consists in preventing transactional fraud (e.g. the circulation of fake letters of guarantee) and therefore in the security of transactions and economic activity and in serving the public interest in cases where the guarantee letters are addressed to public agencies.).

3. **Data Categories:**

- Letter of Guarantee No, Valid amount (up to which the issuing authority provides the guarantee), Type of guarantee letter, Date of issue, Expiry date, Date of last update, Forfeited (YES/NO), Beneficiary's corporate name (if applicable), Beneficiary's trade name (if applicable), Project title (if filled out in the file), Type of Principal (1: natural person, 2: legal person), Principal's Tax Reg. No. and Corporate Name
  - For legal persons: 9-digit Tax Reg. No. and Corporate Name. For companies abroad the Tax Reg. No. will be blank (same as above).
  - For natural persons: the first 8 digits of the Tax Reg. No., the first 3 letters of the surname and 1 of the name.

4. **Sources:** Credit institutions and the Public Works Engineers - Contractors (TMEDE) Fund, which are exclusively responsible for the accuracy of the data sent for entry in the file.

5. **Retention period:** Data relating to guarantee letters are kept on file for 5 years from forfeiture / non-payment of the guarantee letter. In the case of return of the letter, the data are automatically deleted.

6. **Data recipients:** The Competitiveness & Entrepreneurship Operational Programmes Intermediary Body, Credit Institutions and the TMEDE Fund.

K. PROCESSORS:

Access to or the ability to access (as appropriate) all or part of your personal data (as appropriate) is granted, subject to strict confidentiality and the restriction of processing to the minimum necessary, to the following categories of associates who, on the basis of the relevant agreements, carry out processing operations in TIRESIAS' name and on its behalf:

1. Companies providing consultancy services and/or developing IT applications to develop new services.
2. Certified public accountants for carrying out audits.
3. Physical file management companies (storage, destruction, etc.) to meet the need to manage applications submitted to us.
4. Companies which provide data centres on which we host our systems, as well as for the provision of "back up" services.
5. Courier companies for the purpose of receiving, transporting and delivering correspondence between us.
6. Telecommunications service providers (sms, phone, internet, etc.).
7. Equipment, infrastructure, app, software and IT system support and maintenance firms to meet relevant needs and security tests (such as penetration testing).
8. Companies providing indexing services for data collected from public sources.
9. Cloud service providers.

When the relevant service agreements are signed, all measures are taken to ensure that the processors comply with the legislation on the protection of personal data in accordance with the requirements of Article 28 of the General Data Protection Regulation.

L. TIRESIAS AS PROCESSOR

1. "Gefyra III" platform

By decision of the credit institutions, as part of their Corporate Social Responsibility action, a subsidization program for monthly installments of home, consumer and business loans ("Gefyra III") was established in order to reduce the burdens on individuals due to the increases in lending rates from the second half of 2022. In this context, Association of Greek Banks entrusted PWC with the development and operation of an electronic platform

(hereinafter Platform) to support both individuals in filling out the relevant application and processing of data related to their debts covered by the program, as well as credit institutions in implementing the program "Gefyra III". Tiresias, acting as a subcontractor, develops and operates information systems, in which the Platform software has been installed, to support the Greek banking system in the implementation of the "Gefyra III" program. In particular, Tiresias has undertaken the hosting of the Platform in its computer systems. In addition, has undertaken the control, within the platform, of the applications that have been submitted regarding the matching that the debtor has made of his main residence with the properties sent by the financial institutions, on which security encumbrances have been registered. During this matching, Tiresias does not process personal data.

2. Indexation of decisions under Law 3869/2010

Following a services agreement, in order for TIRESIAS to support the monitoring of cases under Law 3869/2010 relating to claims of the assigning creditor from debtors who have submitted an application for inclusion within the scope of the law, it collects and records in its name and on its behalf the progress of the said applications and the relevant court judgments which may have been issued.

3. Central Credit Registry (CCR)

Based on Law 4972/2022, the Bank of Greece was entrusted to create a Central Credit Registry, which will be supplied with credit data from all Greek Banks on a monthly basis. Tiresias is going to undertake, at the behest and on behalf of the Banks, the collection by the Banks, processing and transfer to the CCR of the Bank's credit data, in accordance with the provisions of the Law and the regulatory framework text.

M. AVAILABILITY OF DATA TO RECIPIENTS

TIRESIAS provides the data directly to the recipients as follows:

M.1. Provision of data to credit and financial institutions
M.1.1 Online access

The access of credit and financial institutions and other recipients is carried out by connecting "on line" through DIASNet and using the "3270 emulation" or Web communication protocols (bWeb service) or through automatic communication between the systems of TIRESIAS and the systems of the specific recipient with using MQSeries protocols (via DIASNet) or using Web API protocols (via Internet).

Alarms
> If new data from the DFO and MPS files and new balance sheets, or new data from companies published in the GCR appear for economic operators of the recipient's choosing, and if the data in the DFO and MPS files are updated or a delay in installment repayment in the CCS File, the recipient will be notified by a special email (alarm) in the online system.

RED Report
The provision of RED Report aims at timely notification regarding the increase in risk of the Banks' portfolios. It covers the legal obligation that Banks have towards the regulatory and auditing authorities to systematically monitor their portfolio, to promptly identify customers with an increased probability of default and to proceed with timely management of the debt.

The RED Report is produced after processing data from the Credit Rating System and, in some cases, from the Grants Aggregation System based on specific criteria set by the Banks.

M.1.2. Files (Batch)

Furthermore, the recipients can use the following services:

M.1.2.1. AXI-OM and AXIS-50

It refers to the possibility of providing data from DFO and MPS files after processing based on specific processing criteria that are either predetermined or defined by the recipient, for α specific Economic Operator - customer of his choice, in cases where they have legitimate interest. The result of the processing is transferred to the credit or financial institution that requested the processing in File (Batch) via email or via FTP Server. In case that email is used, the File is encrypted.

M. 1.2.2. EconOp Data Service

Recipients are given the option to request bulk data processing under the following conditions:

a. The data being processed may only relate to their customers which they designate.

b. The data being processed are specified by the recipients and may relate to the DFO, MPS and CCS systems. The processing of CCS data relates to consolidated data.

Moreover, in the context of the EconOp Data service, financial institutions are given the option to obtain a file with the GCR numbers. In particular, they can send a file with a Tax Reg. No. for processing and TIRESIAS can provide the relevant GCR No. after it is matched.

The result of processing (report) is transferred to the credit or financial institution that requested the processing in an encrypted File (Batch) via email or FTP Server and is kept at TIRESIAS for a period of twelve (12) months.

M.1.2.3. BATCH SCORE - SCORE M – Q SCORE – DK SCORE

Recipients are given the option of providing data related to the Credit Rating (Score) of their customers, after processing based on specific processing criteria, in cases where they have legitimate interest. The result of the processing is transferred to the credit or financial institution that requested the processing, in an encrypted File (Batch) via email. The files sent above are retained for a period of two (2) years from their creation.

M.2. Provision of data to commercial parties
M.2.1. Online access

The access of the businessmen to the data of the Risk Checking System (TSEK) is carried out exclusively via internet. This access is implemented either by an "on line" connection, or by using Web protocols to the relevant Website (TSEK Platform), or through automatic communication between TIRESIA's systems and the systems of the specific business using Web Services/Web API protocols.

In the above context, the above recipients are provided with the possibility of activating the Alarm service in the event of new data from the Risk Checking System appearing in them and/or evolution (completion or deletion) of the data in said File for a period of their choice.

M.2.2. Automated Provision of Data Existence Indicator (FASTSEK) and classification based on recipient criteria

The above recipients may, through TSEK, request a) the automated (application to application) provision of indication of the existence of data (YES/NO) based on specific criteria/input filters that they define and b) the ranking of this data (as they result from the application of the above criteria) based on the ranking parameters defined again by him. The input filters are determined by the recipients and are applied per data category (individual or cumulative) and concern a) number of pieces, b) total amount of pieces in the category and c) time period (in years). The ranking of the data of an Economic Operator is a number from 1 to 5 (with decimal subdivisions), where 1 is the lowest value and 5 the highest, based on the following parameterization: a) total amount of data of an Economic Operator, b) time elapsed since the most recent data, c) existence of completed data and d) existence of data included in the procedures of the Bankruptcy Code (Greek Law 3869/2010 etc).

N. Data Protection Officer (DPO)

The Company has appointed a Data Protection Officer in accordance with Article 37 of the General Data Protection Regulation (tel. 210 36.76.700, dpo@tiresias.gr 2 Alamanas St., Maroussi GR-15125).

O. DATA SENT TO THIRD COUNTRIES/ORGANISATIONS

Transfers may be made in accordance with the relevant legislation based on an adequacy decision, suitable guarantees or binding corporate rules. If you do not have the above, the transfer may take place if you grant your consent or the transfer is necessary for the performance of a contract between you and the controller or concluded for your benefit or for reasons of public interest or for the establishment, exercise or defence of legal claims or for the protection of your vital interests.

Based on your consent, and in accordance with the provisions of the GDPR, TIRESIAS may transfer data relating to foreign credit or financial institutions via credit information suppliers as outlined in section I above.

P. DESTRUCTION OF PHYSICAL APPLICATIONS FILE

Registered letters from the Company to citizens that are returned / not claimed are held by TIRESIAS for 3 months from their return. After that period elapses, any interested party may only obtain a copy. Registered letters from the Company relating to the provision of detailed data reports to citizens that are returned / not claimed are held by TIRESIAS for 3 months from their return.

Original supporting documents returned to the Company / not claimed are retained by TIRESIAS for 10 years from the date on which the application is submitted.

The physical file of all applications submitted to TIRESIAS is stored in a fully secure facility and is destroyed after 10 years have elapsed where the relevant report on this has been signed.

Q. EXERCISING YOUR RIGHTS AS DATA SUBJECTS

You have the following rights:

a) Right of access

You should know which personal data TIRESIAS keeps and processes, its origin, the purposes for which it is processed, and the time period for which it is kept per file or overall. Moreover, in the context of exercising your right of access, you can ask to learn about searches made about you by recipients of our files over the last 12 months (number and origin) including any activation of the alarms service in the case of entry or deletion of data relating to you.. The right of access can also be satisfied electronically, if so requested by the subject and the relevant conditions are met (http://www.tiresias.gr)

b) Right of rectification

You can request that inaccurate personal data be corrected and/or supplemented so that it is complete and accurate, including via a supplementary statement (Article 16 of the GDPR). In this case you should submit all necessary documents showing the need to correct or supplement the data. Where corrections are made, TIRESIAS will inform recipients during the last 6 months of the data corrected or during any shorter time that the data was entered in the file.

c) Right to restrict processing

You can ask for a restriction on your data processing. One manifestation of the right to restrict processing is the right not to transmit data, as described below.

d) Right to object

You can refuse and/or object to any further processing of your personal data held by TIRESIAS, including scoring.

e) Right to erasure ("Right to be forgotten")

You can request that your personal data be deleted from the files held by TIRESIAS in accordance with Article 17 of the GDPR. Where data are deleted, TIRESIAS informs recipients during the last 6 months of the data deleted or during any shorter time that the data was held in the file.

f) Right to data portability

You can request data portability in accordance with the conditions laid down in the General Data Protection Regulation.

The following points can be made about the exercise of your rights:

- The data which TIRESIAS enters in its files is absolutely necessary to serve the purpose of processing, and the processing carried out by TIRESIAS and in general the retention of data is necessary to comply with a legal obligation and for the purposes of the legitimate interests of data recipients (which go beyond the rights and freedoms of data subjects) and to implement a contract between them (credit and financial institutions, for which economic behaviour data files are in operation) and the data subjects. In light of the above, TIRESIAS is entitled to refuse your request to limit the processing or deletion of your personal data if the request is not adequately substantiated, if the processing of data is necessary in accordance with the law or to establish, exercise or defend its legal rights.
- Despite the above, and notwithstanding the fact that this right is not provided for by the GDPR but was granted to subjects under the regulatory framework established under Law 2472/1997 and the HDPA's regulatory decisions as a form of the right of objection provided for therein, if TIRESIAS so wishes, it may cease transmitting the data relating to you to the recipients of its files, and an indication to the effect that no data is being transmitted shall be sent.

  This right is a specific manifestation of the right to restrict processing (Article 18 of the GDPR).

- Exercise of these rights is forward looking and does not affect data processing already carried out.

g) Right to complain

You can submit a complaint to the Hellenic Data Protection Authority (www.dpa.gr) where you consider that your rights have been infringed in any manner (https://www.dpa.gr/index.php/el/polites/katagelia_stin_arxi)

To enable you to exercise your rights a Customer Service Office for the general public is open on working days from 08:30 to 14:00 hours (1 Alamanas St., Maroussi GR-15125). On working days from 09:00 to 16:00 there is a call centre in operation at 210 36 76 700. You can also send a written request to that effect to the Company's address or email address tiresias@tiresias.gr and useful information about how to exercise your rights can be found on the TIRESIAS website http://www.tiresias.gr.

If your requests are clearly unfounded or excessive, especially due to their recurring nature, the company may impose a reasonable fee, taking into account the administrative costs for providing information or carrying out the requested steps, or refuse to follow up the request. For more information about the progress of your requests, call 2103676700 (Customer Service Division) during working hours.

Replies to requests

TIRESIAS will reply to your request within thirty (30) days from its submission, except in exceptional cases, in which case the above time-limit may be extended for up to sixty (60) additional days if this is considered necessary, taking into account the complexity of the request and/or the number of requests made. TIRESIAS will inform you in all events in good time about the said extension in the deadline.

TIRESIAS may send its response to requests to exercise access rights or provide information by email where the conditions set out on its website www.tiresias.gr are met.

In the case of other applications relating to the filling out / correction or deletion of data, a response may only be sent by registered mail.

R. PERSONAL DATA PROTECTION

TIRESIAS implements a physical security system and an information security management system to ensure the confidentiality of your personal data and to protect it from accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access and all other forms of unlawful processing and takes all appropriate technical and organizational measures for data security. For example:

- The building in which its data centre is hosted is guarded by security staff who record incoming persons and there is a CCTV system which covers the entrance and perimeter. At the same time, to access critical areas it is necessary to use a card and have access rights.
- Anti-virus software is used.
- Records of operations (users, administrators, databases, operating records) are kept.
- Access to its systems is strictly controlled both for internal and external users.
- A private network is used, etc.
- the company develops, maintains, implements and manages appropriate policies and procedures (eg back up, Data Protection by Default and by Design, Incident Management, etc.) etc.

For more information about TIRESIAS files and its services concerning natural and legal persons, you can search on its websites https://www.tiresias.gr/ & https://tsek.teiresias.gr

S. APPLICABLE LAW

We process your data in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679), the applicable Greek legislation on personal data protection, and in particular

Law 4624/2019, and the regulatory administrative decisions of the Hellenic Data Protection Authority.

Date of last update: 11.2023