

Newsletter Service Personal Data Protection Policy

Data Controller

The company styled "Banking Information Systems SA" with the distinctive title "Tiresias SA" (hereinafter referred to as the Company), having its registered office in Maroussi, Attica, at 2, Alamanas Str., 151 25, tel. 210 36.76.700 processes the personal data of users who subscribe to the Company's newsletter service.

This policy, hereinafter referred to as the "Policy", concerns the conditions for the collection, storage and use of your personal information by the Company, after and during your subscription to the service through the website <http://www.tiresias.gr>; the Policy may be changed/updated from time to time.

Subscription to the service is governed by the Terms of Use.

When do we collect your personal data?

Your data is collected when you subscribe to the Newsletter service.

What categories of personal data we collect?

We use your email address to send you the Newsletter.

Once you have subscribed to the Newsletter, you will receive a confirmation email and then you will be receiving Newsletters until you unsubscribe.

To send a Newsletter, we collect your date and time of subscription in addition to your email address.

Purpose of processing your personal data

We process your personal data for the purpose of sending the Newsletter with news and information about the Company, its activities and other related topics. Your data shall not be used for any other purposes e.g. Sales promotion, advertising or solicitation.

Legal base for processing

We process your above personal data on the legal basis of consent obtained from you, as provided for in item a., par. 1, article 6 of the GDPR.

Subscription to the service and granting of the required consent is made after you have reviewed the relevant Terms of Use of the service and this Policy in the "Subscription to the Newsletter" field of the site, in which you are given the opportunity to register your email, in order to receive a quarterly newsletter from the Company.

More specifically, you enter your email in the corresponding field by clicking on the link "I consent to the receipt of Tiresias SA newsletters in accordance with the relevant Terms of Use and the Privacy Policy" where the corresponding links to the Terms of Use and the Policy are provided.

You subsequently receive an email, in which you are asked to confirm that you consent to receive Newsletters from the Company and wish to subscribe to the relevant service. After accepting you shall be registered in the newsletter's list of subscribers, which is automatically stored in the relevant system.

At any time you may withdraw your consent and unsubscribe from the Newsletter service, as set out below:

For how long do we keep your personal information?

We keep your personal data for as long as you remain registered in our list of recipients and delete them in case you withdraw your consent.

Who do we share your personal data with – where are they kept?

Your data is not transferred to any third parties; it is processed by our authorized staff and kept in Greece.

Processing principles and protection measures

Our Company, inter alia:

- processes only your personal data, which are necessary for the above purposes and only for purposes only;
- takes appropriate technical and organizational measures for the security of personal data (ensuring confidentiality, integrity and availability) by design and by default;
- has in place and applies procedures and systems to ensure the confidentiality of personal data processing, as well as its protection against 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);
- has informed the data subjects (citizens and employees), in accordance with Regulation (EU) 2016/679 (GDPR);
- observes the principle of personal data minimization;
- ensures that data subjects' rights are exercised and fulfilled;
- has prepared the documents, policies and procedures demonstrating its compliance in accordance with the principle of recording the type, categories and flows of personal data, compilation of processing records, impact assessment, etc.) as referred to in GDPR;
- has appointed a Data Protection Officer and set up a personal data protection team;
- provides training and awareness-raising to employees regarding personal data protection;

- amend its partnership agreements with data processors, in accordance with the provisions of Article 28 GDPR for the purpose of full compliance of the latter.

What are your rights and how can you exercise them?

We rely on your consent to process the personal data you provide to us, so that you can receive our Newsletters. You have the right to withdraw your consent at any time, resulting in your information being deleted.

In addition, you have the rights to access your data, to correct it if it is inaccurate or incomplete, to erase it if you withdraw your consent, to restrict processing under certain conditions, and to lodge a complaint with the DPA.

In particular, you have the right to:

a) Know what personal data we keep and process, their origin, the processing purposes, as well as the retention period. Moreover, you have the right to request a copy of your personal data kept by the Company (**right of access**).

b) Request that your personal data be rectified and/or completed so that it is complete and accurate (**right of rectification**). You should provide any required document evidencing the need for rectification or completion.

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

f) Request the deletion of your personal data from the records we keep (**right to be forgotten**).

To unsubscribe (i.e. withdraw your consent to receive the Newsletter), you can click on the relevant link at the bottom of our Newsletter or website or make use of the "contact us" feature or call 210 3676700 or contact tiresias@tiresias.gr.

If you unsubscribe, you will be automatically unsubscribed from the mailing list for the Newsletter. You maintain the option to re-subscribe at any time.

- Exercising the above rights applies to the future and does not affect data processing that has already taken place.

g) Lodge a complaint with the Hellenic Data Protection Authority (www.dpa.gr) in case you feel that your rights have been infringed in any manner (**right to lodge a complaint with the Authority**).

To exercise the above rights, you may send an e-mail to the e-mail address tiresias@tiresias.gr or a telephone call to the number 210 3676700, and in any case you may also send an e-mail to the Company's Data Protection Officer at dpo@tiresias.gr.

Applicable law

We process your Data in accordance with the General Data Protection Regulation 2016/679/EU, and in general the applicable national and European legislative and regulatory framework on 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. 210 36 76 700, dpo@tiresias.gr, 1, Alamanas Str., 151 25 Maroussi, Athens, Greece).