

GENERAL DATA PROTECTION POLICY

in accordance with article 14 of Regulation (EU) 2016/679 (General Data Protection Regulation)

This policy sets out the principles applied by TIRESIAS when processing personal data (categories, legal basis, purpose, protection measures, rights, etc.) and is intended to inform data subjects about processing. It is posted on our Company's websites (<https://www.tiresias.gr/en> and <https://tsek.tiresias.gr/en/Home>) and may be modified/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 which is performed on personal data or on sets of personal data, whether or not by automated means, from collection and storage to erasure or destruction or pseudonymisation.

DATA CONTROLLER

The company styled "BANKING INFORMATION SYSTEMS SA" with the distinctive title "TIRESIAS S.A." ("TIRESIAS") (data controller), headquartered in Maroussi, Attica at 2, Alamanas Str., 151 25 (Tel. +30 210 36 76 700), keeps the following files:

A. REFERENCE REGISTRY

1. Purpose of Processing

Ensure the possibility of accurately identifying natural (and legal) persons contained in the files (hereinafter "Economic Operators," "EO") and correctly correlating the data in TIRESIAS files with the natural (and legal) person with which they are associated.

2. Legal basis for processing

Compliance with the legal obligation of TIRESIAS which consists in maintaining a complete, updated and accurate Data File (article 6(1)(c) GDPR).

3. Data categories

The following data relating to the identification of natural and legal persons, in particular the Tax Identification Numbers (TIN) and identity card (such as police, military, etc.) and/or passport number, the trade name or full name and father's name, the addresses (street number, area, postal code) and the GEMI number, are entered in the Reference Registry.

In addition, the data below are also entered in the Reference Registry, but not transmitted to the recipients:

- for natural persons, gender ¹and date of birth;
- for the legal entities, the year of establishment, the Activity Code Number (KAD) and the company status (active, inactive, etc.).

¹ This information is deleted over time.

4. Data sources

The data of the Reference Registry were originally derived from the 1992 Tax Identification Numbers Registry held by the then Ministry of Finance Information Technology Centre, which was made available to TIRESIAS by the Ministry of Finance.

The Reference Registry has been enriched and updated since then with any additional or newer information (TIN, ID number, addresses, etc.) from the taxpayers' registry of the Independent Authority for Revenue Authority, under on article 17(1)(o) of Law 4174/2013 (Tax Procedure Code), as added by article 52(1) of Law 4569/2018, from the printed or electronic documents of the primary data entered in the EOs as the case may be (derived from Banks, Courts, Land Registries, National Cadastre, etc.), the G.E.MI., as well as from applications submitted by natural and legal persons to TIRESIAS.

With regard to the primary data printed or electronic documents, the contained data relating to the identification of natural and legal persons are compared with the data of the Reference Registry in order to match and, subsequently, enter them as appropriate. In the event that the information of a natural or legal person is missing from the Reference Registry or is different from the Registry's information, it is entered as new EO. The data of these new EOs enrich the Reference Registry.

5. Data retention time: In view of the above processing purpose served by the Reference Registry, the data kept therein are not subject to any time limitation.

6. Data recipients: Any legal recipients of the TIRESIAS files, as described below.

B. ECONOMIC BEHAVIOUR DATA FILES

B.I. DEFAULT FINANCIAL OBLIGATIONS (DFO) AND MORTGAGES -PRENOTATIONS (MPS) FILE (HDPa decision no. 109/99, 24/2004 ^{2*} and article 40 of L. 3259/2004, as in effect)

1. Purpose of Processing:

I. Data on Default Financial Obligations (**DFO**) - to protect commercial credit and help restructure financial transactions by enabling the data recipients to assess the creditworthiness of their counterparties.

II. Mortgage-Prenotations (MPS) Data – to protect commercial credit and help restructure transactions by informing the recipients about liens in rem on their real estate debtors and to consequently enable them to obtain collateral in rem as security against the credit risk they assume.

2. Legal basis for processing: The legitimate interest pursued by the data recipient, consisting in assessing the credit risk assumed or to be assumed, which obviously takes precedence over the rights of the subjects, in accordance with the HDPa decision no. 109/1999 (24/2004) (Article 6(1)(f) of the GDPR), while also being a legal obligation for credit and financial institutions.

3. Data categories: Data about default on specific financial obligations, which are highly objective and concern:

² The Hellenic Data Protection Authority

3. 1. Default Financial Obligations Data

- a. Bounced cheques³
- b. Bills of exchange and promissory notes not paid at maturity
- c. Bankruptcy petitions (Law 3588/2007, Law 4738/2020)
- d. Court judgements overruling bankruptcy petitions due to inadequate debtor assets (Article 6(2) of Law 3588/2007, Article 77(4) of Law 4738/2020 and Article 178(1) of Law 4738/2020)
- e. Declared bankruptcies (Law 3588/2007, Law 4738/2020)
- f. Payment Orders (including rental arrears payment orders)
- g. Real estate auctions
- h. Auctions of movable assets
- i. Conversions of mortgage prenotations
- j. Seizures and orders on real estate under Legislative Decree 17.7/13.8.1923
- k. Termination of card agreements
- l. Termination of loan and/or credit agreements
- m. Administrative sanctions, imposed by the Ministry of Finance, against violators of tax laws to safeguard the interests of the State
- n. Restructuring applications and decisions (no. 99 et seq. Law 3588/2007 and no. 31 et seq. Law 4738/2020)
- o. Petitions for judicial debt settlement (article 4 (1) of Law 3869/2010)
- p. Debt settlement judgements (Article 8 of Law 3869/2010)
- q. Orders of surrender of leasehold property.

3. 2. Mortgage - Prenotations Data

- a. Mortgages
- b. Mortgage prenotations.

4. Data Sources :

The above data are collected from the following sources:

- a. data under 3.1 a, b, k, l, o and p: Credit and Financial Institutions as appropriate, Credit Providers, Leasing Companies, Factoring Companies, Card Issuing and Management Companies, Credit Servicers, Payment Institutions and Electronic Money Institutions (if they provide credit), Microfinance Institutions
- b. data under 3.1 f, h, o, p and q: Magistrates' Courts and, after their abolition, the competent Courts of First Instance
- c. data under 3.1 g and h : the EFKA-TAN auction website and E-auction
- d. data under 3.1 c, d, e, f, n and q : Courts of First Instance
- e. data under 3.1 f : Administrative Courts of Appeal
- f. data under 3.1 i, j and 3.2 a and b : from Land Registry/Cadastral Offices and their Branches
- g. data under 3.1 f : the Ministry of Finance through the Bank of Greece
- h. data under c., d. and e.: the Electronic Solvency Registry (ESR).

5. Data retention time :

5.1 Data category-specific rules

- a. *Bounced cheques, bills of exchange, promissory notes unpaid at maturity and termination of card and credit agreements* (consumer, mortgage and business credit) are kept for a period of two (2) years.

³ For monitoring purposes, the administrative measure of refusal to issue a new cheque book is also recorded. Furthermore, if a bounced cheque has been issued by a legal person, the natural person (representative) who has signed every bounced cheque shall also be recorded.

The above data are deleted from the Registry once the debt has been fully repaid, i.e., all items on Default File - excluding orders of surrender of leasehold property - have been repaid and the prescribed period of time has elapsed for all **data in this category**.

Specifically, data relating to terminations of loan and cards agreement bearing the indication of refinancing or final settlement are deleted in accordance with the above subject to the repayment of the instruments (cheques, new loan, etc.) used for their refinancing/settlement.

b. *Payment orders* are kept for three (3) years (including cumulative orders for payment of rental arrears and surrender of leasehold property).

c. *Auctions, seizures and orders* under Legislative Decree 1923 are kept on File for four (4) years.

d. *Administrative sanctions* of the Ministry of Finance are kept on File for four (4) years.

The data under b, c, and d above are deleted from the Registry once the debt has been fully repaid, i.e. all items on the Default File have been repaid and the prescribed period of time has elapsed for **all data recorded** in the data File⁴.

e. *Bankruptcy petitions* are deleted upon registration of the final information about a declaration of bankruptcy or if the relevant hearing is cancelled, twelve months after the date of the (cancelled) hearing or, if rejected as abusive, twelve months after the issuance of the relevant court judgement. Finally, bankruptcy petitions shall be deleted in any case at the end of the month in five (5) years are completed since the date of filing with the competent Court. In the event that the bankruptcy petition is rejected, due to insufficient debtor assets in accordance with Article 6(2) of Law 3588/2007, the relevant information is entered in the File and kept for ten (10) years. Similarly, in the event that the registration of the debtor's name in the ESR is ordered under Articles 77 (4) and 178 (1) of Law 4738/2020, the relevant information on file shall be retained for ten (10) years.

f. *Restructuring applications* - including applications for (immediate) ratification of a restructuring agreement shall be deleted from the File after a period of five (5) years from the date of their submission to the competent Court, unless a decision on agreement validation is issued, in which case the information on the application and the agreement validation shall be retained on File for a period of five (5) years from the expiry of the agreement term. If a judgement overruling the validation of the restructuring agreement is issued, the information on the application and the relevant court judgement shall be kept on File for five (5) years from the date of publication of such judgement. In the event of a judgement declaring the termination of the procedure due to failure to reach an agreement (e.g. fruitless lapse of deadline for reaching an agreement, renunciation by the mediator), the information on the application and the relevant judgement shall be kept on File for five (5) years from the date of filing of the application with the competent Court. Finally, in the event of termination of a restructuring agreement; fulfilment of a condition subsequent contained in the restructuring agreement; cancellation of a restructuring agreement; and when the term of the restructuring agreement is not available, the information on the respective application and judgement will be kept on file for ten (10) years from the date of filing of the application with the competent Court.

g. Information on *declared bankruptcies* is deleted from the File after ten (10) years where bankruptcy-related operation have been discontinued or if they bear the indication "exemption no. 192 et seq. of the Criminal Code" and in any case after fifteen (15) years from their declaration. Similarly, information on applications and judgements for the validation of a reorganisation agreement shall in any case be deleted after fifteen (15) years.

h. Information on *mortgage prenotations, mortgages as well as conversions of mortgage prenotations*, are deleted from the File when they are eliminated from the respective Public Books/Cadastral Sheets (if the information is kept in a Cadastral Office).

⁴ Especially for seizures, it is required that they be remove from the public books

i. *Applications for judicial settlement of debts*, if a settlement is achieved under Articles 5 and 7 of Law 3869/2010 as in force, shall be kept on File for a period of three (3) years from the repayment of the relevant debts. If the above applications do not result in a settlement, they are deleted from the File three (3) years after the hearing date. In the event of the applicant's waiver, the information relating to the application shall be deleted from the File one (1) year after the filing of the application.

Decisions on judicial settlement of debts are kept on File for a period of three (3) years from the discharge of debts in accordance with the first subparagraph of Article 11 (1) of Law 3869/2010. Decisions on full discharge of the debtor (Article 8 (5) of Law 3869/2010), as well as decisions by which the debtors are declared in default are also retained for three (3) years.

j. The *orders for surrender of leasehold property* are kept on File for three (3) years from their publication, after which they are deleted in any case.

5.2 General rules on retention period of all DFO data:

- In any case, the data under a to d and i above are deleted after ten (10) years. Excluded are data of administrative sanctions that have not been lifted, which are deleted after sanctions have been lifted.
- Information relating to bounced cheques, unpaid bills of exchange, promissory notes, termination of card and loan agreements, payment orders, auction schedules, seizures, orders under Legislative Decree 1923, conversions of mortgage prenotations, bankruptcy petitions and orders for surrender of leasehold property, provided that they do not exceed in total the amount of one thousand euros (€1,000.00), shall not be transmitted. This provision does not apply where the DFO system contains data about a bankruptcy petition, a declared bankruptcy or an administrative sanction of the Ministry of Finance or a restructuring application/judgement, or an application for or a decision on judicial settlement of debts or an auction that bears the indication "ongoing." Non-transmitted data reappear if new information is entered, which results in the €1,000.00 threshold being exceeded.
- The above information that has been proven to have been repaid, provided that it does not exceed €3,000 and three (3) items in total, shall not be transmitted until new data are entered, which either result in any of the above thresholds being exceeded, or have not been repaid.

6. Data recipients: The data of the files are made available for own use to the following recipients.

- a. the Bank of Greece;
- b. Credit institutions;
- c. Financial institutions: factoring companies, leasing companies, card issuing and management companies, credit providers, credit servicers, payment institutions and electronic money institutions, if they provide credit, and microfinance institutions
- d. Public sector bodies whose legitimate interest is evident

B.II. RISK CONTROL FILE (TSEK) (HDP decision no. 186/2014)

1. Purpose of processing: To ensure commercial credit, reliability, security of transactions and the exercise of the rights of economic freedom and freedom of information of undertakings, which provide credit, by enabling traders to assess the creditworthiness of their counterparties.

2. Legal basis for processing: The legitimate interest pursued by the data recipient, which consists in assessing the creditworthiness thus mitigating the credit risk assumed towards its customers and, therefore, the security of transactions, economic freedom and freedom of

information, which obviously prevail over the rights of the subjects and, in the case of credit and financial institutions, the compliance with a legal obligation (Article 6 (1f) GDPR).

3. Data categories: The following data of the Default Financial Obligations (DFO) and Mortgage-Prenotations (MPS) Files.

- Bounced cheques
- Bills of exchange and promissory notes not paid at maturity
- Bankruptcy petitions (Law 3588/2007, Law 4738/2020) Court judgements overruling bankruptcy petitions due to insufficient debtor assets (Article 6(2) of Law 3588/2007, Article 77(4) of Law 4738/2020 and Article 178(1) of Law 4738/2020)
- Resolution applications and decisions (no. 99 et seq. Law 3588/2007 and no. 31 et seq. Law 4738/2020)
- Declared bankruptcies (Law 3588/2007, Law 4738/2020)
- Orders for payment & surrender of leasehold property
- Real estate auctions
- Auctions of movable assets
- Mortgages and mortgage prenotations
- Conversions of mortgage prenotations
- Seizures and orders under Legislative Decree 17.7/13.8.1923
- Applications for or a decision on judicial settlement of debts under Law 3869/2010

In addition, the following Business Information is also provided:

- company data from the Government Gazette and the G.E.MI. (see below under F),
- balance sheets, financial ratios and sector index data.

4. Data Sources : The above mentioned under B – I par. 4 (as the case may be), the Government Gazette and G.E.MI.

5. Data retention time : The above mentioned under B – I par. 5 (regarding DFO-MPS data) and below under F for data from the Government Gazette and G.E.MI.

6. Data recipients: TSEK data are provided for own use to natural or legal persons or associations of persons (Civil Code) who exercise commercial, industrial, craft, agricultural or other business activity in the Greek Territory or in another country of the European Economic Area and Switzerland, in the context of which they trade on credit and, therefore, assume (or are about to assume) a relevant credit risk, which makes it necessary for them to check the solvency of their counterparties, after informing them accordingly.

B. III. CREDIT CONSOLIDATION SYSTEM (CCS) (HDP decision no. 86/02)

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

2. Legal basis for processing: The legitimate interest pursued by the data recipient, which consists in assessing the creditworthiness for the preparation and execution of contracts through which credit risks are assumed, which supersedes the rights of the data subjects and helps prevent over-indebtedness of borrowers, and compliance with a legal obligation (Basel II, Mortgage Credit Directive, etc.) (Article 6 (1) (f) GDPR).

3. Data categories: The data on the Credit Consolidation File relate to information on credit of any kind (including that arising in the context of laws on debt settlement such as Law 3816/2010, Law 3869/2010, Law 4161/2013, Law 4307/2014 etc. or relevant decisions of the Bank of Greece, e.g. Executive Committee Act 102/2016 or Executive Committee Act 175/2020) received by natural and legal persons. Specifically, data are entered regarding current and overdue debts from:

- a. loans of all kinds
- b. credits of any form
- c. cards
- d. letters of guarantee (participation, good performance, receipt of advance payment, timely payment, etc.); and
- e. letters of credit.

4. Data Sources : Credit institutions, credit providers, leasing companies, factoring companies, card issuing and management companies, credit servicers, payment institutions and electronic money institutions (if they provide credit), the Greek Engineers and Public Works Contractors Fund (TMEDE), microfinance institutions (hereinafter referred to as Entities), which are solely responsible for the accuracy of the data they provide.

5. Data retention time : The above data shall be kept on File for five (5) years from their last update by the Entities, whether transmitted in electronic format by the Entity or produced by the interested party as printed certificate of the latter. In the event that the outstanding balance has been paid in full, the information shall be deleted from the name of the guarantor. Especially data relating to letters of guarantee and letter of credit are kept on File for five (5) years from the forfeiture/non-payment of the letter of guarantee or letter of credit. In case of timely return to the Bank, they are automatically deleted.

6. Data recipients: The data of the File are made available for own use to the following recipients.

- a. the Bank of Greece;
- b. Credit institutions;
- c. Financial institutions: factoring companies, leasing companies, card issuing and management companies, credit providers, payment institutions and electronic money institutions (if they provide credit), credit servicers, the Greek Engineers and Public Works Contractors Fund (TMEDE) and microfinance institutions (subject to consent on the limit calculation).
- d. Public sector bodies whose legitimate interest is evident

C. FILE OF LOST – STOLEN IDENTITY CARDS AND PASSPORTS (HDPa decision nos. 523/99, 25/04 and 11/2006)

1. Purpose of processing : With a view to limiting fraud and protecting citizens from any illegal activity against them by means of their stolen, lost or replaced identity cards or passports, TIRESIAS maintains a File in which citizens' statements about theft or loss of their identity cards or passports are registered. This is an auxiliary File and any data entered therein (as in the other TIRESIAS files) are freely evaluated by their recipient, so that their entry does not entail any commitment or obligation for TIRESIAS and their recipients below.

2. **Legal basis for processing:** The legitimate interest of TIRESIAS in creating a File to protect customers and combat fraud against banks (Article 6 (1) (f) GDPR), as well as the compliance of credit and financial institutions with the relevant legal obligation (Know your customer) and protecting the vital interests of the data subject (Article 6 (1) (d) GDPR).
3. **Data categories:** The statements of citizens regarding the theft, loss or replacement of their identity cards and passports and the numbers of lost / stolen / inactive identity cards.
4. **Data Sources :** The data subjects (identity card and passport holders) and the corresponding File of the Ministry of Citizen Protection.
5. **Data retention time:** In view of the processing purpose served by this File, the data kept therein are not subject to any time limitation.
6. **Data recipients:** The data of the File are made available for own use to the following recipients.
 - a. the Bank of Greece;
 - b. Credit institutions;
 - c. Financial institutions: factoring companies, leasing companies, card issuing and management companies, credit providers, credit servicers, payment institutions and electronic money institutions, and microfinance institutions
 - d. Public sector bodies whose legitimate interest is evident

D. COMMERCIAL BUSINESS TERMINATION FILE (HDPa decision no. 6/06)

1. **Purpose of Processing:** To limit fraud at points of sale using credit, debit or other cards and to ensure a safer environment for such transactions.
2. **Legal basis for processing:** The legitimate interest pursued by the data recipient consisting in ensuring a secure environment for their use (acceptance) by its customers – cardholders and the fulfilment of the relevant obligation to international card organisations (e.g. VISA, MASTERCARD, etc.) (Article 6 (1)(f) GDPR).
3. **Data categories:** The recorded data include agreement terminations between Banks, Card Issuing and Management Companies, Payment Institutions, Electronic Money Institutions and businesses regarding the acceptance of credit cards by them, for specific reasons such as anti-contractual or unlawful conduct on the part of businesses (e.g. acceptance of stolen or counterfeit cards, fictitious transactions, “split transactions,” etc.). The File also contains the details (surname, first name, father's name, ID card number, TIN, full address) of the business representatives (up to 4), but no information on the card transactions and card holders.
4. **Data sources :** Credit institutions, Card Issuing and Management Companies, Payment Institutions, Electronic Money Institutions and card acquirers.
5. **Data retention time:** The data are kept on File for five (5) years from the termination.
6. **Data recipients:** The data of the Archive are made available for own use exclusively to credit institutions, companies issuing and managing payment instruments, payment

institutions and electronic money institutions entitled to enter into card acceptance agreements with businesses.

E. FILE OF ASSIGNED CLAIMS ARISING FROM CONTRACTS/CERTIFICATES OF PUBLIC PROJECT EXECUTION

- 1. Purpose of processing:** To protect credit, consolidate transactions and reduce fraud in banking transactions.
- 2. Legal basis for processing:** The legitimate interest pursued by the data recipient, in particular the assignee, consisting in the assignment of existing legal claims thereto (Article 6 (1)(f) GDPR).
- 3. Data categories:** Data on claims assigned to credit and financial institutions against the Greek State, Public Law Entities, local governments, etc., arising from public project contracts and/or certifications of their execution, in whole or in part, are recorded.
- 4. Data sources :** Credit institutions.
- 5. Data retention time:** The data are kept on File for three (3) months from the full payment of the assigned claim. Partly or wholly unpaid data on file are permanently deleted after 5 years from their entry.
- 6. Data recipients:** The data of the File are made available for own use exclusively to units of credit institutions responsible for financing secured by assignments of claims arising from public projects and their execution.

F. FILE OF COMPANY DATA FROM THE GOVERNMENT GAZETTE AND GENERAL COMMERCIAL REGISTRY (G.E.MI.)

- **Purpose of processing:** To ensure the exercise of the rights of free information and economic freedom of the recipients and to facilitate their fulfilment of their obligations, by making available to them data published in the Government Gazette and the G.E.MI.
- **Legal basis for processing:** The legitimate interest pursued by the data recipient consisting in receiving timely, easy and accurate information for the identification of its counterparties being legal persons and associations of persons in general, and their valid establishment, operation and representation, hence the security of transactions (Article 6 (1f) of the GDPR).
- **Data categories:** Publishable deeds and the published details of companies therein relating to the incorporation, establishment of foreign company branch, amendment of the Articles of Association, conversion, merger, split, dissolution, revival and other deeds published according to the above including, but are not limited to, the Government Gazette issue number and date (for previous publications prior to G.E.MI.), the code number and the date of registration in G.E.MI., the G.E.MI. number, the company's Registration Number and Tax Identification Number, form, Activity Code Number (KAD), name, distinctive title and registered office, share capital, number of shares/units, number of directors/partners, term of office of the Board of

Directors, as well as the number of members of the Boards of Directors, managers and partners of the legal entities who in law make such publications, their shareholding rate, as well as the published annual financial statements of companies (balance sheets, etc.). TIRESIAS generates data regarding key financial data and ratios based on the published financial statements.

- **Data sources** : The Government Gazette and G.E.MI.
- **Data retention time** : The data relating to members of the Boards of Directors, managers and partners are kept for ten (10) years from the publication of the relevant Government Gazette or the registration in the G.E.MI., while all other data relating to legal persons are kept without time limitation.
- **Data recipients**: The data of the File are made available for own use to the following recipients.
 - a. the Bank of Greece;
 - b. Credit institutions;
 - c. Financial institutions: factoring companies, leasing companies, card issuing and management companies, credit providers, payment institutions, electronic money institutions, credit servicers, and microfinance institutions
 - d. Public sector entities.
 - e. Traders – recipients of the Risk Control File (TSEK)

G. AUCTION PUBLICATIONS WEBSITE DATA FILE

1. **Purpose of processing**: To facilitate the daily monitoring of auction publications and court decisions (see under 3 below) posted on the EFKA-TAN website.
2. **Legal basis for processing**: The legitimate interest pursued by the data recipient, which consists in ensuring easy and accurate information regarding the daily published auction data on the EFKA-TAN website, in order to assess the need to take any required legal action (e.g. claim announcement or notification of a notary, within the defined time frame) (Article 6 (1) (f) GDPR) or its participation in an auction (Article 6 (1) (f) GDPR).
3. **Data categories**: The data posted on the EFKA-TAN website and relate to new postings of auctions and court decisions related to auctions of movable and immovable property, modifications (changes or deletions) of older posts, descriptions and property valuations, including the File in pdf format accompanying the relevant posts, as well as additional data – data update.
4. **Data sources** : The data are derived from the auction publications website of the Judicial Publications Bulletin of EFKA-TAN (former Jurist Fund) (<https://deltio.tnomik.gr/>) as well as from the e-auction platform.
5. **Method of Data Delivery**: Data are provided to recipients upon request, on a daily basis, in a file, and any additional data, updates and/or corrections to the daily file are provided on a weekly basis or on a daily basis regarding the evolution of the relevant auctions.
6. **Data retention time** : The data are retained for two (2) years from the date of their posting on the website.

- 7. Data recipients:** Data recipients are credit and financial institutions (factoring companies, leasing companies, card issuing and management companies, credit providers, payment institutions, electronic money institutions, credit servicers, and microfinance institutions).

H. BEHAVIOUR SCORE SYSTEM

- 1. Purpose of Processing:** To assess the credit risks assumed or to be assumed more comprehensively and accurately, by means of a rating corresponding to the probability of default on a financial obligation undertaken over the next twelve months, as detailed above under 3 and, therefore, to reduce bad debts.
- 2. Legal basis for processing:** The legitimate interest pursued by the data recipient consisting in assessing the credit risk for the conclusion and monitoring of contracts under which credit risks are assumed, limiting such risks, as well as the risk of over-borrowing, complying with the relevant legal obligations (Article 6 (1)(f) GDPR).
- 3. Data categories:** The behaviour scoring resulting from statistical processing models that calculate it, based on the statistical valuation of past behaviour.

Such model assess:

- A)** The probability of default over the next twelve (12) months in the system of TIRESIAS that is matched on a numerical scale, from 1, which is the most unfavourable value, to 600.
- B)** The probability of recovery over the next twelve (12) months captured by the lowest recovery value D to the highest AA
- C)** The probability of deterioration over the next three (3) months rated from F, which is the worst value, to A.

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

The score for each Economic Operator is calculated a) automatically and is filed monthly for all the Economic Operators on File (as necessary preparation for the provision of parametric services to the recipients, e.g. RED, Critical Economic Units Score Reports, etc. regarding scoring changes); and b) ad hoc upon request of a recipient. In the automatic communication system (via MQ) the score is calculated upon submission of the relevant request of the recipient for specific EO(s).

Each score is accompanied by the 3 key reason, while in some cases it is not possible to calculate a score.

Indicative factors that can affect the above score are:

- delays in the repayment of loan debts;
- data on financial default in the relevant Default Financial Obligations (DFO) File under B.I.3.1. above;
- consistency in the payment of loan debts.

In some cases, score calculation is not possible. In such cases, the recipients are provided with a relevant code regarding the exemption from score calculation and the reason for the exception.

The Behaviour Score is also based on an Economic Operator's Solvency Ranking and is provided to the Subject, upon request, through the written detailed data report.

- 4. Data Sources:** Data from the Default Financial Obligations (DFO), Mortgages – Prenotations (MPS) and Credit Consolidation (CCS) Files processed by specific statistical models to analyse past transactional behaviour of natural and legal persons.
- 5. Data retention time:** The calculated score is kept for two (2) years (rolling).
- 6. Data recipients:** TIRESIAS' Behaviour Score System was developed and operates, by order and on behalf of credit and financial institutions, based on specifications agreed across banks by working groups made up of expert officers of the banks' credit risk assessment units. The sole recipients are credit and financial institutions (factoring companies, leasing companies, card issuing and management companies, credit providers, payment institutions⁵, electronic money institutions⁶, credit servicers and microfinance institutions), which consider the score before taking a relevant credit decision (initial loan or refinancing) along with other information available to them (e.g. income, assets, occupation, etc.) and the credit/refinancing/workout policy they implement in the context of Article 22 (2) (a) of the GDPR.

It is noted that the specific score and the profiling resulting therefrom do not determine whether a loan or credit will be granted by the credit or financial institution(s), as they decide taking into account the other available information available to them and their individual policies.

I. DATA EXCHANGE WITH EUROPEAN CREDIT BUREAUS

TIRESIAS, as a credit bureau, is a member of the Association of Consumer Credit Information Suppliers (ACCIS).

In the context of bilateral agreements between the members of ACCIS, credit and financial institutions are enabled to obtain economic behaviour data from European credit bureaus.

In order for the data to be searched and used by a European credit bureau, the financial institution must have obtained the prior written express consent of the persons to whom the requested data relates. The cross-border exchange of data between the credit bureaus takes place only within the EO in accordance with the GDPR⁷.

- 1. Purpose of Processing:** Evaluation of the creditworthiness and solvency of the persons to whom the data relate.
- 2. Legal basis for processing:** The data are transmitted subject to the consent of the data subjects.
- 3. Data categories:** according to the request of the applicant-recipient, data of the Default Financial Obligations (DFO)/Mortgage-Prenotations (MPS), Credit Consolidation (CCS)

⁵ Provided that they grant credit

⁶ Provided that they grant credit

⁷ Credit Institutions operating in Greece may derive data for residents of Member States from the "locally competent" European credit bureaus and Credit Institutions of the Member States.

reference files, on the basis of the bilateral agreement with the foreign credit bureau and the principle of reciprocity.

4. **Data sources** : European Credit Bureaus, in the territory of which the data subject resides and/or operates.
5. **Data retention time** : One (1) year in the context of the accountability principle and based on the bilateral agreement between TIRESIAS and the other credit bureau.
6. **Data recipients**: Credit institutions, factoring companies, leasing companies through a domestic credit bureau.

I. CHECK ON THE VALIDITY OF LETTERS OF GUARANTEE

The recipient is enabled to check the validity of a letter of guarantee and/or any forfeiture thereof. In order to receive the relevant information, it is required that they fill in the number of the checked L/G, as well as the issue date or the amount thereof.

1. **Purpose of Processing**: The purpose of such processing is to reduce and prevent fraud by enabling recipients to check the validity of a Letter of Guarantee.
2. **Legal basis for processing**: The legitimate interest pursued by the data recipient (ensured by recording of the above data), consisting in the prevention of fraud in transactions (e.g. counterfeit letters of guarantee) and, therefore, ensuring the security of transactions and financial activity and serving the public interest where letters of guarantee are addressed to Public sector bodies.
3. **Data categories**:
 - Letter of Guarantee Number, Valid Amount (guaranteed by the Issuing Authority), L/G Type, Issue Date, Expiry Date, Date of Last Update, Called (YES/NO), Beneficiary's Name (if applicable), Beneficiary's Distinctive Title (if applicable), Project Title (if recorded in the File), Type of Principal (1: PP, 2:DP),
 - For legal persons: the 9-digit TIN and Name. For foreign companies, the TIN field shall be empty (same as above).
 - For natural persons: the first 8 digits of the TIN, the first 3 letters of the surname and 1 of the name⁸.
4. **Sources**: Credit institutions and the Greek Engineers and Public Works Contractors Fund (TMEDE), which are solely responsible for the accuracy of the data they transmit for registration in the File.
5. **Data retention time** : The data relating to letters of guarantee are kept in the File for five (5) years from the forfeiture/non-payment of the letter of guarantee. In case of return they are automatically deleted.
6. **Data recipients**: The Intermediate Body of the Competitiveness & Entrepreneurship Operational Programs, the Credit Institutions and the Greek Engineers and Public Works Contractors Fund (TMEDE).

⁸ For the purpose of serving the public interest, the Intermediate Body of the Competitiveness & Entrepreneurship Operational Programs is provided with full information about the principal

K. DATA PROCESSORS

Access to or ability to access (as appropriate) part or all (as appropriate) of your personal data is granted, subject to absolute confidentiality and restriction of processing to the minimum necessary, to the following categories of partners, who by virtue of relevant contracts perform processing in the name and on behalf of TIRESIAS.

- Companies providing consultancy services and/or developing IT applications for the development of new services;
- Certified public accountants for the performance of audits;
- Physical file management companies (storage, destruction, etc.) to meet the need of manage applications submitted to us;
- Companies providing computer centres for our systems hosting and file “back up” needs;
- Courier companies for the needs of receiving, transporting, delivering our correspondence;
- Telecommunication providers (sms, telephony, internet, etc.);
- Equipment, infrastructure, app, software and IT system support and maintenance companies to meet relevant needs and security tests (e.g. penetration tests);
- Companies providing indexing services of data collected from public sources;
- Cloud service providers.

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

L. TIRESIAS AS THE DATA PROCESSOR

1. Indexing of decisions under Law 3869/2010 (Law 4745/2020)

Following a service contract and in order for TIRESIAS to support the monitoring of cases under Law 3869/2010 (Law 4745/2020), relating to the claims of the creditor in question against debtors who have applied for inclusion in the law, it collects and indexes, in the name and on behalf of the creditor, the progress of the above applications and any relevant court judgements that may have been issued.

2. Central Credit Register (CCR)

Based on Law 4972/2022, the Bank of Greece was assigned to create a Central Credit Register, which will be fed with Credit Data by Credit and Financial Institutions on a monthly basis. In this context, in accordance with Act 2691/30.06.2023 of the Governor of the Bank of Greece, the above creditors may fulfil the obligation to feed the data they hold into the CCR through a central IT hub of TIRESIAS.

TIRESIAS has already undertaken to collect, process and transmit to the CCR, by order and on behalf of contracted credit and financial institutions, their Credit Data, in accordance with the provisions of the Law and the regulatory framework.

M. MAKING DATA AVAILABLE TO RECIPIENTS

TIRESIAS makes data directly available to their recipients as follows:

M.1 Data made available to credit and financial institutions

1.1.1. Online access

Credit and financial institutions as well as other recipients have online access via DiasNet using the “3270 emulation” or Web (bWeb service) communication protocols, or through direct communication between the TIRESIAS’ and the specific recipient’s systems using the MQSeries (via DiasNet) or Web API (via Internet) protocols.

1.1.1.2. Alarm service

Recipients will be notified via an alarm in the online system when new data appear in the Default Financial Obligations (DFO) and Mortgages – Prenotations (MPS) Files regarding an EO selected by the recipient and/or new balance sheet or company information is published in the G.E.MI., as well as where information is filled in the DFO/MPS Files or there is a delay in a payment in the File.

1.1.2. Batches

Furthermore, recipients are enabled to use the following services:

1.1.2.1. EO-DATA

Recipients who have the right to access files, as required, may request data batch processing subject to the following conditions:

- a. the Data processed may only relate to their customers as defined by them;
- b. the data processed are defined by the recipients and may relate to the DFO, MPS and/or CCS Files. CCS Data processing concerns aggregated data.

In addition, within the framework of the EO-DATA service, financial institutions are also provided with the possibility to obtain a File with the G.E.MI. numbers. Specifically, they may send a File with Tax Identification Numbers (TIN) for processing, and TIRESIAS returns a file with matching G.E.MI. numbers.

The processing output (report) is transmitted to the credit or financial institution that requested the processing in an encrypted Batch File via email or FTP Server.

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

Recipients are given the possibility to receive data related to the Credit Score of their customers, after being processed based on specific criteria and their legitimate interest. The processing output is transmitted to the credit or financial institution that requested the processing in an encrypted Batch File via email. The aforementioned sent files are kept for a period of two (2) years from their generation.

1.1.2.3. Risk Early Detection (RED) Report

The RED (Risk Early Detection) Report aims at providing early notice regarding the risk increase of the Credit and Financial Institutions’ portfolios. It covers the legal obligation of Banks towards regulatory and supervisory authorities to systematically monitor their portfolio,

identify customers with high probability to default and proceed to debt management in a timely manner.

The RED Report is generated after processing data from the Credit Consolidation File and the Behaviour Score System, based on specific criteria set by the above institutions.

After being sent to credit and financial institutions the batch files referred to under 1.1.2.1 - 1.1.2.3 are kept for two (2) years from the date of their creation.

M.2 Making data available to traders

M.2.1 Online access

Traders can access the data of the Risk Control File (TSEK) solely via the Internet. Such access is implemented either via an online connection, or by using Web protocols to the respective Website (TSEK Platform), or through direct communication between the TIRESIAS' and the specific trader's systems using Web Services/Web API protocols.

In the above context, the above recipients are given the possibility to activate the Alarm service in case new data have appeared on the Risk Control File and/or the data on this File have been changed (supplemented or deleted) over a period of time of their choice.

M.2.2 Automated data indication (FASTSEK) and ranking based on recipient criteria

The above recipients may, through the TSEK, request a) automated (application to application) provision of an indication of the existence of data (YES/NO) based on specific entry criteria/filters set by them; and b) ranking of such data (arising after the filters have been applied) based on the ranking parameters set by him again. The input filters are determined by the recipients and are applied per data category (individually or cumulatively) and concern a) number of items; b) total amount of the category items; and c) time period (in years). EO data are ranked on a five-point scale (with decimal points), where 1 is the lowest value and 5 is the highest based on the following parameterisation : a) total amount of EO data; b) time that has elapsed since the most recent data; c) existence of completed data; and d) existence of data regarding the procedures of the Bankruptcy Code, Law 3869/2010, etc.

N. DATA PROTECTION OFFICER (DPO)

The Company has appointed a Data Protection Officer in accordance with art. 37 of the General Data Protection Regulation (Tel. +30 210 36.76.700, dpo@tiresias.gr, 2, Alamanas Str., 151 25 Maroussi, Athens, Greece).

O. DATA TRANSFER TO THIRD COUNTRY/ORGANIZATION

Data may be transferred in accordance with the relevant legislation, on the basis of an adequacy decision, appropriate safeguards or binding corporate rules. In the absence of the above, the transfer may take place if you give your consent, or if 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 support of legal claims, or for the protection of your vital interests.

Subject to your consent and in accordance with the provisions of the GDPR, TIRESIAS may transfer data concerning you to foreign credit or financial institutions through credit bureaus, as described above under I.

P. DESTRUCTION OF THE PHYSICAL FILE OF APPLICATIONS

Returned/ unsolicited registered letters sent by the Company to citizens are kept by TIRESIAS for three (3) months from their return. Upon expiry of this period, any interested party may only receive a copy. Returned/unsolicited registered letters of the Company regarding the provision of a detailed data report sent to citizens are kept by TIRESIAS for three (3) months from their return.

Returned/unsolicited original supporting documents are kept by TIRESIAS for ten (10) years from the submission of the subject's application.

The physical File of all applications submitted to TIRESIAS is kept in full security and is destroyed by signing a relevant protocol after 10 years.

Q. EXERCISE OF RIGHTS OF DATA SUBJECTS

You have the following rights:

a) Right of access (Article 15 GDPR)

You have the right to know what personal data are kept and processed by TIRESIAS, their origin, the purposes of processing, as well as the retention period per File of as a whole. Moreover, in the context of exercising your right to access, you can request information about the searches made about you by the recipients of our files in the last twelve months (number and origin), alarm triggered in case of entry or deletion of data concerning you. The right of access may also be exercised electronically, if requested by the interested party and the relevant conditions are met (<https://www.tiresias.gr>).

a) Right of rectification (Article 16 GDPR)

You have the right to request that any inaccurate personal data be rectified and/or supplemented so that they are complete and accurate, including by means of a supplementary statement. In such case, you should provide any required document evidencing the need for rectification or supplementation. In case of correction, TIRESIAS informs the recipients of the rectified data during the last six months or any shorter period that the data in question has been recorded in the File.

c) Right to erasure (right to be forgotten) (Article 17 GDPR)

You have the right to request the erasure of your personal data from the files kept by TIRESIAS, in accordance with the provisions of the GDPR. In case of deletion of data, TIRESIAS informs the data recipients deleted during the last six months before the deletion or any shorter period that the data in question has been recorded in the File.

d) Right to restriction of processing (Article 18 GDPR)

You have the right to request the restriction of processing of your data, as provided for in the GDPR.

Upon satisfaction of the request, the disputed data in the respective file will be replaced by the indication "the right to restriction of processing has been exercised with regard to these data," which is evaluated freely by the recipients.

The restriction of processing may apply to all data of all TIRESIAS' files.

Following the exercise of the above right, TIRESIAS proceeds to the investigation of the disputed data and, based on the outcome, it either deletes the data or lifts the restriction after prior notification of the data subject.

The right of non-transmission of data is an aspect of the right to restriction of processing. In particular, this right is not provided for by the GDPR, but was granted to subjects under the regulatory framework of Law 2472/1997 and the regulatory decisions of the Authority as a form of the right to object set out therein. Therefore, if you so wish, TIRESIAS may cease to transmit the data of the economic behaviour and score files that concern you to its recipients, and send a relevant indication (non-transmission of data) thereafter.

e) Right to data portability (Article 20 GDPR)

You have the right to request to receive your personal data provided by you to a controller in a structured, commonly used and machine-readable format, as well as to request the transmission of such data to another controller, in accordance with the provisions of the GDPR.

f) Right to object (Article 21 GDPR)

To refuse and/or object to any further processing of your personal data kept by TIRESIAS, including scoring.

g) Right to non-Automated Individual Decision Making (Article 22 GDPR)

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects which concern or significantly affects you.

The above right is exercised towards the credit or financial institutions which make decisions based on the automated processing.

h) Right to complain (Article 77 GDPR)

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.

Exercise of Rights

To exercise your rights, the company operates a Customer Service Desk on working days from 08:30 to 14:00 (Alamanas 1, 151 25 Maroussi). You may also contact the call centre at +30 210 3676700 on working days from 09:00 to 16:00. In addition, you can address your request in writing to the above address or via e-mail to tiresias@tiresias.gr. Moreover, useful information regarding your rights and how to exercise them are available on TIRESIAS website <https://www.tiresias.gr>.

The data entered into TIRESIAS' files are absolutely necessary for the purpose of processing. The processing and, generally, the retention of data is necessary for compliance with a legal obligation, as well as for the purposes of the legitimate interests of data recipients (which prevail over the rights and freedoms of their subjects) and the performance of a contract between them (credit and financial institutions, for the sake of which the economic behaviour data files are kept) and the subjects. In accordance with the above, TIRESIAS the right to deny your request for restriction of processing, erasure of your personal data or objection, unless it is sufficiently substantiated, if the processing of the data is necessary in accordance with the law or for the establishment, exercise or support of its legal rights.

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

Responses to requests

TIRESIAS will respond to your request within thirty (30) days from its submission, except in exceptional cases, in which case the above deadline may be extended for up to another sixty (60) if necessary, considering the complexity of the request and/or the number of requests. TIRESIAS will in any case inform you in due time about such extension of the deadline.

TIRESIAS may also reply to requests for access or information via e-mail, subject to the conditions set out on its website, provided that the conditions listed on its website are complied with.

For other requests relating to the supplementation /correction or deletion of data, the 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 their protection against accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access and any other form of unlawful processing and takes all appropriate and suitable technical and organisational measures for data security.

By way of example:

- the building where the data centre is hosted is guarded by security personnel who record the incoming persons, and there is a CCTV system covering the entrance and perimeter; Moreover, access to critical areas requires the use of a card and access rights;
- anti-virus software is used;
- activity logs are kept (users, administrators, database, operating system);
- access to its systems by both internal and external users is strictly controlled;
- an intranet is used;
- appropriate policies and procedures (e.g. back up, Data Protection by Design and by Default, Incident Response, etc.) are developed, maintained, implemented and managed;

For more information on the files of TIRESIAS and its services to natural and legal persons, you can refer to its websites <https://www.tiresias.gr> & <https://tsek.tiresias.gr>.

S. APPLICABLE LAW

We process your Data in accordance with the General Data Protection Regulation 2016/679/EU, the applicable Greek legislation on the protection of personal data, in particular Law 4624/2019, as well as the regulatory administrative acts of the Hellenic Data Protection Authority.