



NBG Securities

NATIONAL SECURITIES SINGLE MEMBER S.A.

PERSONAL DATA PROTECTION STATEMENT

National Securities Single Member S.A. with distinctive title: NBG Securities (henceforth the “Company”), as a Controller, acknowledges and gives top priority to its requirement to comply with the applicable regulatory and legal framework on the protection of individuals with regard to the processing of their personal data.

The purpose of this statement is to provide information to you as potential and/or existing customers and in general as persons carrying out businesses with the Company regarding the processing of your personal data, in the context of Company's operation and of your overall transactional relationship with the latter pursuant to the provisions of the General Data Protection Regulation 2016/679 (GDPR) and in accordance with its specific regulatory framework. For legal entities, this privacy statement is addressed to their representatives, managers, shareholders, management bodies, employees and legal advisors, whose personal data are processed by the Company due to their connection with the legal entities.

With this statement, you will be informed about the following:

- I. Who we are (Company’s contact details)**
- II. Company’s General Principles on the processing of personal data**
- III. What personal data can be processed**
- IV. Which might be the purposes of processing**
- V. To which recipients can your data be communicated**
- VI. Provisions in the event of any personal data transmission to third countries (cross-border transmission)**
- VII. Duration for which your data is held**
- VIII. Action taken when the period of keeping your data has passed**
- IX. Your rights for the protection of your personal data**
- X. Company’s obligations during your personal data processing**
- XI. Ensuring protection against phishing**
- XII. Installation of CCTV for security reasons**
- XIII. Recording of telephone conversations**
- XIV. E-services: internet web trading**
- XV. Update-amendments of the privacy statement**

I. WHO WE ARE (COMPANY’S CONTACT DETAILS)

National Securities Single Member S.A. is an investment company, registered with the General Commercial Registry (GEMI), under GEMI No. 999301000, website address <https://www.nbgsecurities.com>, headquartered in 128-132 Athinon Ave, Athens, postal code 104 42. In the context of its operations, the Company offers a wide range of investment products and services that respond to the constantly changing needs of businesses and individuals.

II. COMPANY'S GENERAL PRINCIPLES ON THE PROCESSING OF PERSONAL DATA

In the context of its operations, the Company ensures that the processing of personal data is effected under the following general principles:

- your data have been collected fairly and lawfully, with your consent where required, for a specific, explicit and legitimate purpose, and are fairly and lawfully processed in light of such purpose,
- the collected data are adequate, relevant and not excessive in relation to the purpose for which they are processed,
- the data are reviewed for accuracy and are regularly updated in accordance with the appropriate procedures,
- your data are kept in a form which permits identification of your identity for the period required for the purposes of processing,
- adequate security measures are taken to protect your data against such risks as loss, unauthorized access, destruction, unlawful processing or disclosure,
- before the processing of your personal data, you are properly informed and you provide your consent, where required, actively and on a voluntary basis . Your consent can be withdrawn at any time, without of course affecting the lawfulness of processing based on consent before its withdrawal.

Your consent is not required in the following cases:

- a) for the performance of a contract you have entered with the Company;
- b) in order to take steps at your request prior to entering into a contract;
- c) for compliance with a legal obligation to which the Company as a controller is subject;
- d) for the protection of your vital interests,
- e) for the performance of a task carried out in the public interest or in the exercise of official authority,
- f) when the processing is necessary for the purposes of the legitimate interests pursued by the Company, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

III. WHICH PERSONAL DATA CAN BE PROCESSED

The Company collects, maintains and processes the personal data you disclose or you have already disclosed to the Company as potential or/and current customers and in general as persons carrying out businesses with the Company at all stages of your transactional relationship in the context of the products /services provided by the Company or through it, as well as data arising from your investment account activity. It is noted that the Company processes each time only the personal data which are necessary for such purpose. In particular, the Company may process the following personal data:

Personal data that you provide to us, such as:

- identification and legalization data (full name, date and place of birth, ID or passport, Social Security Number),

- demographic data (sex, nationality, family status),
- contact details (address, telephone number or mobile phone, email address),
- financial status data (salary, property, tax residence),
- access data for e-applications (e.g. web-trading).

It is noted that you are required to inform the Company timely for any possible change on the aforementioned data.

Personal data collected by the Company, such as:

- in the context of due diligence, sanctions monitoring and anti-money laundering,
- in the context of monitoring and evaluating your creditworthiness, risk management of the Company and in general within the customer service of your contractual or transactional relationship with the Company,
- in compliance with the current legislative and regulatory framework for the submission of data to the supervisory authorities,
- in the context of your correspondence and general communication with the Company,
- financial information evaluating your investment and financial status and behavior,
- cookies and relevant technologies that enable access and use of specific pages or/and website pages for statistical purposes,
- data, transferred by supervisory, judicial and other Public Authorities and Independent Authorities, which relate to criminal convictions, offences, enforcement actions to protect the Public interest, seizures, confiscations, commitments,
- data related to you which are publicly accessible either electronically or otherwise.

The personal data processed by the Company are held in physical and/or electromagnetic form.

In particular regarding the protection of minors:

The Company acknowledges the need to protect minors' data as defined by the current regulatory framework. Minors' data are stored by the Company only if provided by those having custody of the minor and only for the fulfillment of a relevant business relationship for the benefit of minors. It is noted that under no circumstances does the Company deal directly with minors, nor its products and services are directed for immediate use by minors, and the Company deals only with those having custody of minors.

IV. WHICH ARE THE PURPOSES OF PROCESSING

The Company may process the aforementioned personal data of yours, for the following purposes:

- A) In the context of the performance of a contract or before its conclusion, in particular:
- i. for the identification and verification of your information,

- ii. for communicating either at pre-contractual stage or on issues related to your transactional relationship with the Company,
 - iii. for the service, management, monitoring, and process of your transactions and in general for the provision of the requested product and/or service of the Company,
 - iv. for the service of any transaction performed through e-services (web trading),
 - v. for collecting the required information in order to evaluate the possibility of providing a product or service.
- B) As part of the Company's compliance with the obligations established by the applicable legal and regulatory framework in force, in particular regarding:
- i. the prevention and suppression of money laundering and terrorism financing,
 - ii. the implementation of existing tax legislation, including the provisions on the automatic exchange of information for tax purposes,
 - iii. the evaluation of the data subjects' creditworthiness, where required for the performance of their transactional relationship,
 - iv. the assessment of compatibility and any other assessment or categorization of the customer, as appropriate, for the creation or provision of a financial product or service,
 - v. the recording and filing of all the customers' orders for executing transactions on financial products, including the obligation of recording their orders provided via telephone,
 - vi. the notification and transfer towards the competent supervisory, independent, law enforcement, judicial and Public Authorities in general, as well as third-party legal entities that are duly authorized, when required in accordance with the applicable legislation.
- C) In the context of the Company's lawful operation, the safeguarding of its interests and the overall orderly functioning and protection of your transactions, in particular with regard to the collection and/or analysis of data relating inter alia to:
- i. your interests, your preferences and your overall transactional activity in the context of the development and /or improvement of the Company's products and services,
 - ii. resolving potential requests/complaints of yours,
 - iii. risk assessment and risk management in the context of the Company's operations,
 - iv. preventing and dealing with cases of fraud and other illegal activities for the protection of the public and the safety of the personnel, including the video surveillance system, the transfer of data within the NBG Group,
 - v. in case of transfer, concession (either directly or as collateral) and/or securitization of any or total of burden, claims, guarantees, liens, securities under any agreement of the client with the Company, towards any third party(ies).
- D) In the context of informing you regarding new products and/or services (i) of the Company and its Group Companies and (ii) Third-Party Companies, which are available through the Company, and match your interests and preferences, under the condition that you have provided your explicit

consent to that end. In this case, you are informed that you have the right to withdraw your consent at any time, without affecting the legitimacy of the processing that was based on consent, prior to its withdrawal.

In particular with regard to automated decision making, including profile creation:

In specific cases, such as when it is required for the conclusion or execution of your contract with the Company or upon your explicit consent, processing of your data may also be carried out through automated procedures resulting in decisions based on statistical analysis of the particular parameters that make it possible to objectively evaluate your requests and overall transactions with the Company.

V. TO WHICH RECIPIENTS CAN YOUR DATA BE COMMUNICATED

Recipients of the data that the Company is obliged or entitled to disclose, by law or regulation or court order or in the context of lawful operation of the data subjects' business and contractual relationship with the Company, may be third parties (natural or legal persons), public authorities, services or other bodies, such as:

(a) National Bank of Greece Group companies, such as (i) National Bank of Greece, (ii) Ethniki Hellenic General Insurance S.A., (iii) NBG Asset Management Mutual Funds, (iv) Pronomiouhos S.A. Genikon Apothikon Hellados, as well as any persons (individuals or legal entities) cooperating with the Company in any form, acting in the name and on behalf of the Company, in order to achieve the purpose of processing the contract (such as Advisors or Affiliates),

(b) third parties, natural or legal persons, acting by order and on behalf of the Company, including the following categories:

- i. Record keeping and destruction companies,
- ii. Contact center services companies,
- iii. Supply and support of information systems companies,
- iv. Analysis and market research and product promotion companies,
- v. Guard and security companies,
- vi. Custodianship Services Companies
- vii. Advisory firms, including financial advisors and auditors of the Company,
- viii. Data reporting providers,
- ix. Property valuers.

(c) Companies to which the Company's claims are transferred, such as Special Provisions Purpose Companies, in the context of securitization of receivables and Credit Acquisition Firms under Law 4354/2015, as in force.

(d) The Deposit and Investment Guarantee Fund, the Guarantee Fund for Investment Services, Hellenic Exchanges S.A., Banks and Financial Institutions both in Greece and abroad,

(e) Social Security Bodies, Public Institutions, Chambers of Commerce and Public Companies,

(f) Credit Institutions, Payment Institutions, Electronic Money Institutions, Investment Firms (Investment Services S.A.), Mutual Fund Management Companies (M.F.M.C.), Execution and Trading venues, Clearing and Settlement Companies and Systems, Trade Repositories,

(g) Supervisory, Judicial, Independent and Other Authorities at national and European level to meet Company's obligation under law or regulation or court judgment, such as: the Bank of Greece, the European Central Bank, the European Commission for Competition, the Hellenic Capital Market Commission, the Hellenic Competition Commission, US Securities & Exchange Commission (SEC), Financial and Economic Crime Unit (SDOE), Financial Police, Public Authorities in Greece and abroad, Courts, Prosecutions, Investigators, Notaries, Court Bailiffs, Mortgage Registries, Greek and Foreign Attorneys-At-Law,

(i) Certified Accountants and Auditing Firms.

It is noted that the Company will further inform you on any potential transfer of your data to the aforementioned recipients, provided that it is required from the current legislation.

The Company may disclose your personal data to competent Supervisory Authorities, Independent, Law Enforcement, Judicial and other Public Authorities, where required from the current legislative and regulatory framework, on a regular or exceptional basis, upon request or if it is required to report the said data without prior notification.

It is noted that when the Company entrusts the processing of personal data to third parties acting in the name and on behalf of the Company, they must comply fully with Company's instructions, the said compliance is achieved by specific provisions in the relevant contractual texts of outsourcing and in the adoption of similar procedures.

VI. PROVISIONS IN THE EVENT OF ANY PERSONAL DATA TRANSMISSION TO THIRD COUNTRIES (CROSS-BORDER TRANSMISSION)

In the context of its operations and in compliance with the provisions of the applicable regulatory framework, the Company may transfer/receive personal data to and/or from other NBG Group companies, as well as interconnect specific files if necessary.

The said transfer or interconnection is effected in accordance with the provisions of European legislation on companies registered in member states within the European Economic Area (EEA) or with the local legal framework as regards companies registered outside the European Economic Area (EEA).

Personal data may only be disclosed to third countries outside the European Economic Area (EEA), if the foreign law provides for an adequate level of data protection. In case the foreign law does not provide an adequate level of data protection, personal data may only be transferred to such country if either the data subject has explicitly consented to the transfer, or if data protection is provided for by an adequate data transfer agreement (i.e. if you, as the data subject, have explicitly given your consent for this transfer).

The Company ensures, through appropriate procedures, that the required procedures are carried out by the local authorities, as well as that each Group Company involved ensures the safe processing of personal data transmitted or interlinked.

VII. DURATION FOR WHICH YOUR DATA IS HELD

The Company processes your personal data throughout the duration of each contractual agreement with the Company and after its termination or expiration as long as it is defined by the applicable legal and regulatory framework.

In particular, your data processed by the Company must be held throughout the period required for the purpose of their processing and/or the applicable legislative and regulatory framework.

After the end of this period, the data are held in accordance with the applicable legislative framework for the period provided from the termination of a business relationship or for the period required to protect Company’s rights before a Judicial or other competent Authority.

VIII. ACTION TAKEN WHEN THE PERIOD OF KEEPING YOUR DATA HAS PASSED

In the event that the duration for keeping your data has expired, the Company pays special attention to how this data will be destroyed. For this purpose, it has established and implements a relevant procedure applied after having examined that it is not necessary to keep archives material for compliance with legal and regulatory requirements or for the protection of the Company's interests and is based on the instructions of the Hellenic Data Protection Authority. The Company shall ensure that the above process of file destruction containing personal data also binds third parties providing services in the name and on behalf of it and any other persons with whom it cooperates in the context of outsourcing or other kind of agreements.

IX. YOURS RIGHTS ON THE PROTECTION OF YOUR PERSONAL DATA

Following the verification of your identity, you, as a Data Subject, have the following rights:

Right to Information	The Company must provide you with any information in relation to the processing of your personal data, including what data the Company processes, for which purpose, for how long the Company keeps them, in a concise, understandable and easily accessible form using clear and simple wording.
Right of Access	You have the right to obtain from the Company confirmation as to whether or not personal data of yours are being processed, and, if so, you have the right to access to the personal data.
Right to Rectification	You have the right to obtain from the Company the rectification of inaccurate or incomplete personal data of yours and the right to have incomplete personal data completed.
Right to Erasure	You have the right to obtain from the Company the erasure of your personal data, which can be satisfied if certain conditions are met.
Right to Restriction	You have the right to obtain from the Company restriction of processing under certain conditions.
Right to Object	You have the right to object, at any time, to processing of personal data concerning you. The Company shall then no longer process your Personal Data unless it demonstrates compelling legitimate grounds for the processing, which override the interests, rights and freedoms of yours or for the establishment, exercise or defense of legal claims.
Right to Obtain Human Intervention	You have the right to ask from the Company not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Right to Portability	You have the right to ask from the Company and receive your Personal Data that you have provided in a structured, commonly-used and machine-readable format or to ask the Company to transmit those data to another controller.
-----------------------------	---

In order to further facilitate the exercise of your relevant rights, the Company ensures the development of internal procedures so as to respond timely and effectively to your relevant requests.

For the exercise of the aforementioned rights of yours, please submit your request by filling Company's special forms available at the Company's registered office.

For issues relating to the processing of your personal data, you may contact the Data Protection Officer (DPO) in writing by mail or electronic mail (National Securities Single Member S.A., Data Protection Officer, 128-132 Athinon Avenue, 10442, Athens, dpo@nbgsecurities.com).

In case that you consider that the protection of your data is in any way affected, you may also lodge a complaint with the Data Protection Authority using the following contact details:

Website: www.dpa.gr /

Address: 1-3 Kifissias Avenue, 115 23, Athens

Tel: +30 210 6475600

Fax: +30 210 6475628

email: contact@dpa.gr

X. COMPANY'S OBLIGATIONS DURING YOUR PERSONAL DATA PROCESSING

A. Ensuring Confidentiality and Safety of Processing

The processing of personal data shall be confidential and carried out exclusively by persons acting under the authority of the Company and/or the Group Companies. Such persons shall be chosen on the basis of strict qualifications established by the Group and providing sufficient guarantees in respect of knowledge (or specialized know-how where required) and personal integrity to ensure such confidentiality.

Moreover, to protect personal data, appropriate procedures based on high-level security standards have been incorporated in the network, and controls are carried out on a regular basis to ensure strict implementation of the criteria established by the Group for this purpose.

The Company implements appropriate organizational and technical measures to secure data and protects them against any data breach, such as an accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access as well as any other form of unlawful processing. Such measures must ensure a level of security appropriate to the risks presented by processing and the nature of the data subject to processing.

B. Security of IT systems

To ensure confidentiality of all data held in its IT systems, the Company has established Policies and IT Security Manuals, to ensure:

- protection of the data handled by the data and voice networks used by the Company,
- efficient control of users' access to Company's IT systems and protection of the data managed by these systems,
- identification and prevention, to the highest possible level, of any events of breach of the security of Company's IT systems.

XI. PROTECTION AGAINST PHISHING

The Company makes it clear that under no circumstances will it ever ask from you, by any means whatsoever (phone, e-mail or any other means of contact), to disclose your personal data (ID particulars, bank account numbers, etc.) or codes (user ID, password), and that any such request should be deleted immediately, notifying the Company accordingly.

XII. INSTALLATION OF CCTV FOR SECURITY REASONS

To prevent theft of assets, avert criminal acts and protect customers and employees, the Company has installed Closed Circuit Television (CCTV) systems in its premises, where necessary.

The installation and operation of such systems is in conformity with the provisions of the applicable regulatory framework, including appropriate technical specifications, informing customers accordingly, length of time that CCTV data are held, etc.

The recording and preservation of personal data via the Company's CCTV and door security systems is in accordance with the applicable regulatory framework.

XIII. RECORDING OF TELEPHONE CONVERSATIONS

The Company uses technical means for the recording of telephone conversations with clients for the provision of client transactions carried out from specified Business Units within the framework of execution and provision of relevant trading activities in accordance with the applicable regulatory framework in force. In these cases, there is specific information provided to the clients as well as to the colleagues before the recording of the telephone conference takes place.

XIV. E-SERVICES: WEBTRADING

If you make use of the Company's website, you should be aware that the Company collects personal data of visitors / users of its website only when they voluntarily provide them for the purpose of providing electronically available services (e.g. . electronic web-based trading services using a computer, tablet or mobile device, submission of a request from a user, regarding information on a Company's product and / or service updates, comments / suggestions of the visitors / users). The personal data collected on the web site depend on the requested, each time, service from the visitor / user and may be: name, surname, identity card number, age, gender, occupation, Tax Registry Number, address, telephone number, e-mail address. Where appropriate and depending on the service requested, it is optional for some of the above information to be filled in by the visitor / user. The Company may process part or all of the data provided by the visitors / users for the purpose of

providing services that are available electronically as well as for statistical purposes and for improving the information services provided.

The website may include hyperlinks to other websites which are under the responsibility of third parties (natural or legal persons). Under no circumstances is the Company responsible for the terms of protection and management of the personal data that these websites follow.

Cookies

The Company may collect identification data for visitors / users of its website by using relevant technologies such as cookies and / or Internet Protocol (IP) address tracking. Cookies are small text files that are stored on the hard drive of each visitor / user and do not access any document or file from someone's computer. They are used to facilitate visitor / user's access to the use of specific services and / or site pages for statistical purposes and in order to determine the areas that are useful or popular, as well as to assess the effectiveness of the site and to improve the performance of the site. These data may also include the type of browser used by the visitor / user, the type of computer, its operating system, Internet service providers and other information of this kind. In addition, the site's information system automatically collects information about the visitor / user's site and about the links to third-party websites he may choose through the use of the Company's website.

The visitor / user of the website may set its web browser in such a way as to either warn him or her about the use of cookies on specific services, or not allow the acceptance of cookies in any way. To do so, please refer to your network browser or help screen instructions to learn more about these features. For example, in Internet Explorer, you can go to Tools / Internet Options / Security and Privacy to customize the browser to your requirements.

If the visitor / user of the website does not allow the use of cookies for his identification, this may have an impact on the ability of the Company to provide certain services (e.g., Web Trading transactions will not be possible) or information that may be useful to him/her.

Lastly, the Company can leverage the capabilities provided by Google Analytics, and in particular with Display Advertising, utilizing the remarketing features to promote its products and / or services online. In particular, third-party vendors, including Google, display advertising messages from the Company on various websites on the Internet. The Company and third-party vendors, including Google, use cookies (such as the Google Analytics cookie) or third party cookies (such as DoubleClick cookie) jointly to update, optimize, and serve advertising messages based on previous visits of someone on their site. Our site visitors / users may declare that they do not wish to be recipients of relevant messages and are excluded from future actions in Display Advertising and adjust Google Display Network ads using Ads Settings or enable the Google Analytics opt-out browser add-on, if they so wish, through the <https://tools.google.com/dlpage/gaoptout> link (looking for a further subscription at the <https://support.google.com/chrome/answer/187443?hl=en>).

XV. UPDATE-AMENDMENT OF THIS STATEMENT ON PERSONAL DATA PRIVACY

The Company may update, supplement and / or amend this Privacy Statement in accordance with the applicable regulatory and legislative framework, without previous notice. In this case, the updated Statement will be posted on the Company's website (<https://www.nbgsecurities.com>) and will also be available in the Company's offices.