



## **PRIVACY NOTICE FOR PROTECTION OF PERSONAL DATA**

Alpha Bank Cyprus Ltd (hereinafter the “Bank”) is committed to protecting your personal data. The Bank will collect, process and use your personal data in compliance with the Law Providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018) (hereinafter the “Law”) as amended and/or replaced from time to time, the provisions of Regulation (EU) 2016/679 (hereinafter the “General Data Protection Regulation” or “GDPR”) and any other legal and/or regulatory requirements.

### **1. Purpose of this Privacy Notice**

The purpose of this privacy notice is to provide you with information about the processing of your personal data within the context and/or in view of a business relationship with regard to a product or service of the Bank. Furthermore, through this privacy notice you are being informed with regard to your personal data protection rights, as prescribed by the current legislative and regulatory framework.

The type of data we collect and the purpose of their processing depends largely on the type of products and services you have requested or that have been provided to you, or based on the relationship you maintain with the Bank.

For instance, if you are an authorized representative/agent of a legal entity or of a natural person which/who is a customer or prospective customer, or a beneficial owner of a legal entity which is a customer or prospective customer, or a non-customer counterparty in a transaction of a customer, we shall need to collect and process your personal data which may include amongst others, identification data such as surname, forename, identity card/ passport number, date and place of birth and nationality, communication data, account identification data, whether you are a politically exposed person, FATCA/CRS information, and authentication data (e.g. signature). In the event that you are a prospective or present guarantor for a credit facility, information collected may also include, amongst others, economic data such as property and earnings data.

### **2. Who is responsible for the data processing and who you can contact**

The entity responsible for your data processing is:

Alpha Bank Cyprus Ltd  
3, Lemesou Avenue  
P.O.Box 21661  
2112 Nicosia,  
Cyprus

Telephone: 22888888

Fax: 22334868

Website: [www.alphabank.com.cy](http://www.alphabank.com.cy)

The contact details of the Data Protection Officer of the Bank are:

Alpha Bank Cyprus Ltd  
3, Lemesou Avenue  
P.O.Box 21661  
2112 Nicosia,  
Cyprus

Telephone: 22888880

Email Address: [dpo@alphabank.com.cy](mailto:dpo@alphabank.com.cy)

Should you have any questions or require more details about how we use your personal information, you may contact us at the contact details above.



### 3. What personal data we process and where we collect personal information from

In the context of your business relationship with the Bank, we process personal data that we receive from you or your representative(s) following your authorization, or through your access to the Bank's alternative channels such as the website and Alpha 360 Web. In case of any alteration(s) to your details, you have to inform the Bank promptly.

To the extent necessary, in order to provide our services, we also process personal data that we obtain from our holding company Alpha Bank S.A. (hereinafter the "Group"), subsidiary companies within the Bank's Group in Cyprus, as well as from publicly available sources such as the Department of Registrar of Companies and Official Receiver, the Land Registry, commercial registers, the media and third parties we cooperate with (e.g. insurers, introducers, advisers, legal firms, tracing agencies, debt collection agencies, credit reference agencies, anti-money laundering prevention authorities etc.).

Personal data, or personal information, means any information about an individual from which that person can be identified. We may also sometimes collectively refer to e.g. collection, recording, retrieval, use, disclosure, erasure or transmission of any data or set of data as "processing" of personal data.

Relevant personal data may include, amongst others:

- a) Identification data, such as surname, forename, identity card/passport number, tax identification number, date and place of birth, nationality and other demographic data.
- b) Communication data, such as postal and e-mail address, landline and mobile phone number.
- c) Economic data, property and family status data, for instance profession, earnings, dependent family members, tax and income data.
- d) Data regarding failure to meet financial obligations, such as information regarding cheques that have not been honored, failure to make due payments on credit agreements, information regarding court proceedings and collections, bankruptcies, dismissal of debt orders and personal repayment schemes.
- e) Credit data, such as debts to credit and/or financial institutions.
- f) Credit profiling and credit scoring.
- g) Data from your contract(s) with Bank and your use of the products granted.
- h) Data on your knowledge and experience in the investment sector.
- i) Data from payment transactions and payment services.
- j) Recognition data of your electronic identity and transactional behavior, which are provided by devices (eg. mobile phones, tablets) connected to the Bank's systems or applications, such as your IP address and your position and location data deriving from the aforementioned devices, as well as internet browsing data (cookies), which on their own or in combination with unique identifiers may be used to identify you.
- k) Image data from the taking of photos of immovable property by valuers and surveyors, in the context of property valuations.
- l) Data relating to telephone communications and/or video conferences between you and the Bank, recorded pursuant to the provisions of the relevant legal framework.
- m) Image data from the video recording systems at the Bank's premises, bearing the relevant special signs (e.g. at the entrances of the Bank's branches and main buildings, ATMs).
- n) Biometric data regarding (i) the characteristics of your handwritten signature placed on electronic media with the use of a special pen through an electronic device of the Bank (e.g. tablet) and (ii) your photograph (dynamic selfie), collected from the camera of your mobile phone device or any other electronic device (e.g. computer, tablet) which is submitted in the context of the remote identification procedure for the provision of the Bank's products and services, where applicable.
- o) Your qualified certificate for electronic signature issued by qualified trust service providers, in accordance with Regulation (EU) 910/2014 (eIDAS), as applicable.

We wish to bring to your attention that we do not process without your explicit consent, personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, data concerning health or data concerning a natural person's sex life or sexual orientation, referred to as special categories of personal data in the GDPR. However, we cannot rule out the possibility that you yourselves share such information with the Bank.

Furthermore, in regards to the data of children, i.e. persons under eighteen (18) years of age, there is a possibility that the Bank collects and/or processes their personal data, provided that prior consent is obtained from their parents or legal guardian, unless permitted and/or required by relevant legislation.



#### 4. Who we disclose your personal data to

Nothing relating to your personal data will be disclosed to anyone, other than in the cases permitted by the legal and regulatory framework in force from time to time. These are:

- a) Where we (or any third party acting on our behalf) are legally compelled to do so.
- b) Where it is in our legitimate interests to disclose information (e.g. to protect us from loss or to recover any loss that we have incurred).
- c) Where disclosure is made at your request or with your consent or to satisfy our contractual obligations towards you.
- d) Where disclosure is required for purposes of compliance with the legal and regulatory framework governing and binding the Bank, such as, when it comes to disclosing information from correspondent banks about specific transactions for the purpose of preventing and suppressing money laundering and terrorist financing.

Personal data may be forwarded to the Bank's Group, to subsidiary companies within the Bank's Group in Cyprus and to countries where the Group carries out its operations for the purpose of assessing the total risk being assumed.

Your personal data may also be forwarded to organisations and bodies including but not limited to:

- a) Regulatory and other authorities, within the context of their legal obligations and/or authorities.
- b) Credit reference agencies (e.g. Artemis Credit Bureau Ltd), debt collection, tracing and fraud prevention agencies.
- c) Valuers and surveyors for real estate valuation purposes.
- d) Any party linked with you or your business's product or service, such as guarantors and security providers.
- e) Independent financial and other advisors.
- f) Companies or individuals you ask us to share your data with.
- g) Natural persons and legal entities, to which the Bank assigns the execution of certain tasks on its behalf, including amongst others, insurance companies, call center companies, lawyers, law firms, notaries and bailiffs, mediators and mediation centers, experts, database management companies, risk management companies, research companies of communication and/or property data, file storage and record-keeping companies, market research, advertising and promotion companies acting on behalf of the Bank, as well as postal service providers, providers of services related to the development, maintenance and customization of IT applications, e-mail service providers, companies providing web-hosting services, including cloud services, companies providing payment services.
- h) Banks and other financial institutions and payment service providers based in Cyprus or abroad which have been licensed and operate legally, for the purpose of facilitating (i) the execution of transactions to and from your accounts and (ii) the provision of services you request.
- i) Institutions offering co-financing, financing or provision of guarantees, where appropriate, such as the European Investment Bank and the Republic of Cyprus.
- j) Natural or legal persons with which we have contracted, amongst others, for the provision of services to the Bank, including services relating to the operation of your accounts and the provision of services to you, and which are bound by confidentiality provisions or professional secrecy obligations.
- k) If you have a debit or any type of credit card with us, we will share transaction details with organisations which help us provide this service (such as Visa and Mastercard).
- l) If you have been granted a product which is linked with a loyalty scheme offered by a business partner of Bank we may need to share your personal data to the extent necessary for the provision of the loyalty scheme.
- m) If you apply through our network for an insurance policy offered by an insurance company, we may pass your personal or business details to the insurance company.

#### 5. Why do we process your data (purpose of processing) and on which legal basis

We process your personal data in compliance with the provisions of GDPR, the applicable local legislation as amended and/or replaced from time to time as well as any other relevant legislation, rules and/or regulations.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

In particular, we process your personal data for one or more of the following reasons:



a) Compliance with legal obligations

As a bank, we are subject to various legal obligations (e.g. in relation to anti-fraud and anti-money laundering) as well as banking regulatory requirements (as set by e.g. the European Central Bank or the Central Bank of Cyprus).

b) Execution of a contract or in the context of forming a contract

The processing of personal data is carried out in order to perform banking transactions and provide financial services pursuant to contracts with you or to take steps at your request prior to entering into a contract. The purposes of the data processing are primarily dependent on the specific product granted to you and the contract terms and conditions provide more details concerning the relevant purposes.

c) Safeguarding legitimate interests

Where necessary, we process your data in order to safeguard our legitimate interests. Examples of such processing include but are not limited to:

- i. Asserting legal claims and mounting a defence in the event of litigation.
- ii. Preventing criminal acts.
- iii. Actions to manage our business and further develop services and products.
- iv. Safeguarding the Bank's IT security and IT operations.
- v. Image data from the video recording systems at the Bank's premises for the protection of the property, safety and physical integrity of the Bank's employees, customers and visitors.
  
- vi. Image data of immovable property taken by valuers in the context of property valuations.
- vii. Performing land registry searches for restructuring non-performing loans.
- viii. Transferring, assigning (whether outright or as security for obligations) and/or selling to one or more persons (including the Central Bank of Cyprus) of, and/or charging and/or placing an encumbrance over any or all of the Bank's rights, title or interest under any agreement between you and the Bank.

d) On the basis of your consent

Insofar as you have granted your consent for the processing of your personal data for marketing purposes, the lawfulness of such processing is based on your consent. The same applies to the forms of consent mentioned in paragraph 3 above.

Any such consent granted, may be revoked at any time by contacting the Bank. Nevertheless, this will not affect the lawfulness of any processing that was carried out prior to the withdrawal of your consent.

## **6. How long we keep your personal information for**

Your personal data will be kept for as long as you are a customer of the Bank and/or for as long as you maintain any type of relationship with the Bank.

When your relationship with the Bank ends, we may maintain your personal data for a period of up to ten (10) years. Your data may be kept for longer than the said period if it is not possible to be deleted due to legal and/or regulatory and/or technical reasons. If we do so, we will ensure that your privacy is protected and the data is used only for the purposes stated in paragraph 5 above.

We also note that if, by the expiration of the above period, there are on-going judicial proceedings with the Bank concerning directly or indirectly the customer, then, the above period for the retention of the data will be extended until a final judicial decision is issued.

In case you provide us with personal data for the purposes of becoming a customer of the Bank but for any reason whatsoever you do not become a customer, we shall maintain your personal information for a period of up to six (6) months from the date of notification of the rejection of your application for banking services and/or credit facilities, or from the date of withdrawal of such application, in accordance with directives issued by the Cyprus Commissioner for the protection of personal data.

In all respects, where a shorter or longer time period for the retention of data is provided for by law or regulatory acts, the retention period mentioned above will be reduced or increased proportionately.



## 7. Data transferred to a country outside the European Union

The Bank may transfer your personal data to countries outside the European Union (third countries) in the following cases:

- a) Where the European Committee has issued delegated acts for the adequate protection of the personal data in the specific country or to an international organisation.
- b) Where you have been specifically informed and have provided your explicit consent to the Bank and the other conditions of the legislative framework are met.
- c) Where the transfer is necessary for the execution of a contract, for example where the transfer is necessary for the execution of a payment order to a bank account held at a credit institution in a third country, or in the event of a transfer for the purpose of executing an instruction relating to a transaction in financial instruments.
- d) Where such transfer is necessary to establish, exercise or support legal claims or defend the Bank's rights.
- e) Where there is an obligation under a legal provision or a transnational or international convention.
- f) In the context of complying with obligations on the automatic exchange of information in the tax area, as these result from the regulatory framework.

For the fulfilment of the obligations set out in e) or f) above, the Bank may transfer your personal data to relevant national authorities so that they can convey them to the relevant third country authorities.

## 8. What data protection rights you have

The following are the rights you have pursuant to the provisions of the GDPR as well as any other relevant legislation in relation to data protection:

- a) Right of access. You have the right to know which of your personal data are being kept and processed by the Bank.
- b) Right to rectification. If you realize that the data we hold about you are incomplete or inaccurate, you have the right to request their correction and/or completion. In such a case, in order to verify the accuracy of the new data, we will ask you to provide any necessary documentation from which the need for completion or correction arises. Either way, this constitutes an obligation of every customer.
- c) Right to erasure. You have the right to request the erasure of your personal data where there is no valid reason for us to continue their processing. However, please note that we may not always be able to comply with your deletion request due to specific legal reasons, which will be communicated to you.
- d) Right to object. You have the right to object to the processing of your personal data, at any time and for reasons related to your particular situation where the legal basis for such processing are the Bank's legitimate interests. In the event that you exercise such right, your data will cease to be processed, unless the Bank proves compelling and legitimate reasons, which override your interests, rights and freedoms.
- e) Right to restrict processing. The said right applies in the following cases: (i) your personal data are not accurate; (ii) where processing may be unlawful, however you do not want us to erase your data but rather to restrict it; (iii) where you need us to hold the data even if we no longer require it; or (iv) where you may have objected to our use of your data but we need to verify whether we have legitimate grounds to use it.  
If you exercise the abovementioned right, the data in question, other than being stored, will be processed only with your consent or for the establishment, exercise or support of legal claims, or for the protection of the rights of another natural or legal person, or for important public interest reasons in the European Union or member state.
- f) Right to data portability. You have the right to receive a copy of your personal data in a structured, commonly used and machine-readable format. You may even ask the Bank to transfer your data to any other data controller of your choice.
- g) In case that the processing of your personal data is based on consent, you may withdraw such consent at any time. Nevertheless, this will not affect the lawfulness of any processing that was carried out prior to the withdrawal of your consent.
- h) In case of an automated decision-making, as per paragraph 11.B. below, you have the right to request the review of such rejected request, with human intervention.

## 9. Ways in which you can exercise your rights

If you wish to exercise one of the aforementioned rights, you may contact us:



- a) in one of the Branches of our Network, by filing in the relevant request form “Application for Data Subject Requests”;
- b) by completing the electronic application form «Application for Data Subject Requests” through the Bank’s website, which is available in the following link: [ALPHA BANK \[CY\] - Application](#);
- c) by sending an email to the Data Protection Officer at [dpo@alphabank.com.cy](mailto:dpo@alphabank.com.cy);

In case of submission of a request to exercise your rights, the Bank shall respond to your relevant request within one (1) month of receipt. The time limit may be extended by a further two (2) months, due to the complexity of the request or the receipt of multiple requests. In the case of an extension, you shall be informed accordingly in advance.

The exercise of the aforementioned rights is free of charge. However, we note that the Bank may charge an operational fee in cases where your requests are deemed to be unfounded or excessive, in particular due to their repetitive nature.

We draw your attention to the fact that the Bank has, in any case, the right to refuse a request regarding the restriction of processing or the erasure of customer data if the processing or maintenance of such data is necessary for the establishment, exercise or support of the Bank’s legitimate interests, its legal rights or for the Bank’s compliance with its legal obligations.

The exercise of the right to data portability which takes place under the conditions laid down in the preceding paragraph, does not imply the immediate erasure of the data from the Bank’s records.

## **10. If you choose not to provide your personal information**

In the context of our business relationship we may need to collect personal information due to legislative or regulatory obligations, or under the terms of a contract we have, or that we may potentially enter into, with you. Without this data, we will not be able to enter into or perform the terms of a contract with you, including the execution of transactions to and from your account, neither to provide you with our services.

## **11. To what extent we use automated decision making and profiling**

In general, the Bank does not make decisions solely on the basis of automated processing. Nevertheless, part of your data may be automatically processed, indicatively, for the following reasons:

### **A. Profiling**

The Bank may create a customer profile, for the following purposes:

- For promotional purposes, provided that you have given your consent to the Bank for this purpose (marketing profiling). In this context, the Bank processes personal data, such as that regarding your creditworthiness and transactional behaviour.
- For your classification as a private or professional client in accordance with the relevant legal framework for investments (indicatively: Directive 2014/65/EU (MiFID II) which was transposed into Cyprus law by Law regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets (L. 87(I)/2017) and the assessment of your suitability and compatibility for the provision of investment services/products. In this context, the Bank processes your personal data, such as your knowledge and experience in the investment sector.
- To assess the risk of money laundering and terrorist financing. In this context, the Bank processes data such as identification data, financial and property data and data from the execution of transaction payments.

### **B. Automated individual decision making**

The Bank may proceed with decisions based on automated individual decision making, which may include customer credit profiling in accordance with Article 22 of the GDPR, for the purpose of assessing the credit



risk in cases of approval or rejection of an application for a loan or credit, of an application for a credit limit increase, of an application for debt restructuring, etc., (necessary for the conclusion or execution of your contract with the Bank), after the processing of your financial and property data, as well as of the data on the breach of your financial obligations, on your creditworthiness, on your transactional behavior and on your credit scoring.

In any case, you have the right to object to the automated decision making and to request the review of a rejected request with human intervention.

## 12. Lodging a complaint

In case that you are not satisfied with the way we process your personal data, you may contact us using the information mentioned in paragraph 2 above. Furthermore, you have the right to lodge a complaint with the Office of the Commissioner for Personal Data Protection and you can refer to the relevant website for more details: [Γραφείο Επιτρόπου Προστασίας Δεδομένων Προσωπικού Χαρακτήρα \(dataprotection.gov.cy\)](https://www.dataprotection.gov.cy).

## 13. Cookies

When you visit our website, our system automatically collects information about your visit, such as your browser type, your IP address and the referring website. You can set your browser to not save any cookies of this website and you may also delete cookies automatically or manually. However, please note that by doing so you may not be able to use all the provided functions of the Bank's website in full.

For more information on how cookies are used, you may refer to Alpha Bank's Cookie Policy, which is available on the Bank's website, at the following link: [ALPHA BANK \[CY\] - Cookie Policy](#).

## 14. Changes to our privacy notice

We may amend this privacy notice from time to time. In case of any changes, we will provide a relevant update and modify the date of issue of this privacy notice accordingly. The revised version of the privacy notice will be available at the Branches/Units as well as on the website of the Bank [www.alphabank.com.cy](http://www.alphabank.com.cy) and it is our recommendation that you review it periodically so as to be always informed on the ways in which the Bank protects and processes your personal information.

Date: 09/2/2024