PRIVACY NOTICE FOR THE 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. About 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, this privacy notice informs you of your rights concerning the protection of your personal data, as prescribed by the applicable legislative and regulatory framework.

The type of data that is collected 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 on the relationship that 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). Where 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.

More generally, this notice is addressed to individuals who are existing, potential or former customers of the Bank or who maintain or have maintained any business relationship with the Bank. Furthermore, this privacy notice concerns any individual whose personal data has been acquired or may be acquired by the Bank in the course of its business activities.

2. Who We Are and How to Contact Us

Data Controller:

Alpha Bank Cyprus Ltd

1, Spyrou Kyprianou Avenue
P.O. Box 21661
1065 Nicosia,
Cyprus

Telephone: 22888333

Website: www.alphabank.com.cy

Data Protection Officer (DPO):

Alpha Bank Cyprus Ltd

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

Telephone: 22888880

Email Address: 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 Collect and Where It Comes From

In the context of your business relationship with the Bank, we process personal data that we receive directly from you or your representative(s) following your authorization, or through your access to the Bank's alternative channels. 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"), companies of the Bank's Group, 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.

Personal data that are collected include amongst others:

a) Identification data, such as surname, forename, identity card/passport copy, 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) Financial, property and family status data, such as profession, earnings, assets, dependent family members and other income details.
d) Data regarding failure to meet financial obligations, such as information regarding cheques that have not been honoured, failure to make due payments on credit agreements, information regarding court proceedings and collections, bankruptcies, dismissal of debt orders and personal repayment schemes.
e) Data on creditworthiness, such as debts to credit and/or financial institutions from loans and/or credits.
f) Data on transactional behaviour, such as data on the operation of your contract(s) with the Bank and/or the Bank's Group and/or the companies of the Bank's Group and the use of the products and/or services that you have been granted as well as data on the consistency with outstanding financial obligations.
g) Data concerning suspicious transactions that may conceal or involve money laundering and/or terrorist financing.
h) Credit scoring data.
i) Data on your knowledge and experience in the investment or the insurance sector, including your financial status, your risk tolerance level and your investment and insurance goals.
j) Transaction data in financial instruments and investment transactions in general and/or data for transmitting orders to carry out such transactions.
k) Data from the execution of payment transactions to you and from you and from the use of payment services.
l) Recognition data of your electronic identity and transactional behaviour, 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 for your identification.
m) Data on your health and the health of your dependents, where necessary, upon submission of your request (such as, indicatively, a request for restructuring of your debts due to inability to pay due to health factors) and its assessment by the Bank and/or for accessibility reasons to the Bank's premises and/or services.
n) Image data from taking photos of immovable property by valuators and surveyors, in the context of property valuations.
o) 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, transaction counters ATMs).
p) Data relating to your telephone communications and/or video conferences with the Bank, recorded pursuant to the provisions of the relevant legal framework.
q) Biometric data regarding (i) the characteristics of your handwritten signature placed on electronic media with the use of a special pen (e.g. tablet), such as speed, acceleration and pace and (ii) the photograph of your face in the form of a dynamic self-portrait (dynamic selfie), submitted in the context of the remote identification procedure for the provision of the Bank's products and services, where applicable.

r) Qualified certificate of your electronic signature, issued by qualified trust service providers, in accordance with Regulation (EU) 910/2014 (eIDAS), as applicable.

We note that, as a general rule, we do not collect or process personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, nor genetic data, biometric data used for identification purposes, data concerning health, or data relating to an individual's sex life or sexual orientation, all of which are classified by the GDPR as special categories of personal data.
Such data are processed only where permitted by applicable law, including situations where you have provided your explicit consent or where another lawful basis or exemption under the GDPR and applicable legislation applies.
However, we cannot exclude the possibility that you may voluntarily disclose such information to us on your own initiative.

Furthermore, with regard to children's data, that is, data relating to individuals under eighteen (18) years of age, the Bank may collect and/or process their personal data, provided that the consent of their parent(s) or legal guardian has first been obtained, unless such collection and/or processing is otherwise permitted or required by applicable law.

4. Who We Share Your Personal Data With

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 the Bank (or any third party acting on the Bank's behalf) is legally compelled to disclose information.
b) Where it is in the Bank's legitimate interests to disclose information (e.g. to protect the Bank from loss or to recover any loss incurred).
c) Where disclosure is made at your request or with your consent or to satisfy the Bank's 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.

Your personal data may be forwarded to the Bank's Group, to subsidiary companies of the Bank's Group 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) Bank employees who are responsible for handling any requests you have submitted to the Bank for the provision of products and/or services, as well as for the management and operation of your contract(s) with the Bank, for processing transactions at your behest, thus fulfilling the obligations arising therefrom and the relevant obligations imposed by law. Bank employees shall in any case abide by the legal framework, including bank secrecy laws.
b) Supervisory, auditing, independent, judicial, governmental and/or other authorities and entities within the legal framework of their competencies, duties and authorities.
c) Credit reference agencies (e.g. Artemis Credit Bureau Ltd), non-performing loan and debt collection, tracing and fraud prevention agencies.
d) Valuators and surveyors for real estate valuation purposes.
e) Independent financial and other advisors.
f) Qualified trust service providers in accordance with Regulation (EU) 910/2014 (eIDAS), as applicable in the context of issuing a qualified electronic signature certificate.
g) Companies specializing on cyber and data security, located in Cyprus or abroad, offering systems and/or services for purposes of investigation, prevention and countering cyber- attacks.
h) Any party linked with you or your business's product or service, such as guarantors, security providers and co-account holders of your joint accounts.
i) Companies or individuals you request that we share your data with.
j) 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, provision of printing and packaging services, market research, advertising and promotion companies acting on behalf of the Bank, 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 (eg. JCC Payment Systems Ltd).

k) Natural or legal persons that the Bank has contracted with, 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.

l) Businesses participating in the Bank's customer loyalty or reward programs for the purpose of providing you with benefits from such programs and contacting you with respect to your participation in the Bank's loyalty programs, draws, competitions and a potential win.

m) 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.

n) Institutions offering co-financing, financing or provision of guarantees, where appropriate, such as the European Investment Bank and the Republic of Cyprus.

o) If you have a debit or any type of credit card with the Bank, we will share transaction details with organisations which help us provide this service (such as Mastercard).

p) If you have been granted a product that is linked with a loyalty scheme offered by a business partner of the Bank, we may need to share your personal data with them to the extent that is deemed necessary, for the provision of the loyalty scheme.

q) If you apply through our branch network for an insurance policy offered by an insurance company, we may pass your personal or business details to the insurance company, in the context of the Bank's intermediary activity for concluding insurance contracts and in case the contract is concluded, in the context of your orders for the provision of relevant products and/or services.

The Bank binds contractually the service providers with which it cooperates, to ensure the protection of the confidentiality of personal data, which may be transmitted for a specific purpose, in compatibility with this notice.

5. Why We Process Your Personal Data and the Legal Basis for Doing So

The Bank processes your personal data in compliance with the provisions of the 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.

Your personal data will only be processed for the purposes for which it was collected, unless it is reasonably considered that it should be used for another reason that is compatible with the original purpose.

In particular, the Bank processes your personal data for one or more of the following reasons:

a) <u>Compliance with legal obligations</u>

The Bank is 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) <u>Execution of a contract or in the context of forming a contract</u>

The processing of your 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) <u>Safeguarding legitimate interests</u>

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 of the Bank's premises for the protection of the property, safety and physical integrity of employees, customers and visitors.
vi. Image data of immovable property taken by valuators in the context of property valuations.
vii. Data of your telephone communications or videoconferences with the Bank, collected from the Bank's recording systems.

viii. Land registry searches for restructuring non-performing loans.
ix. Disclosure and collection of personal data from supervisory, auditing, independent, judicial, governmental and/or other authorities and entities, in the context of the Bank's internal functions and operations.
x. Notification and receipt of personal data to and from supervisory, auditing, independent, judicial, governmental and/or other authorities and entities in the context of the Bank's operations.
xi. 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. Duration of Personal Data Retention

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. We may retain your data for a longer period where this is required or permitted under applicable law and/or the relevant regulatory framework. In such a case, we will ensure that your data remains protected and is used solely for the purposes set out 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. Personal Data Transfers Outside the European Union and to International Organisations

The Bank may transfer your personal data to countries outside the European Union (third countries) under the following terms and conditions:

a) Where the European Commission has decided, by means of implementing act, that a specific third country or international organisation, ensure an adequate level of protection for the personal data.
b) Where appropriate safeguards have been provided for the processing of personal data, including binding corporate rules.
c) 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.
d) 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.
e) Where such transfer is necessary to establish, exercise or support legal claims or defend the Bank's rights.
f) Where there is an obligation under a legal provision or a transnational or international convention.
g) In the context of the Bank's compliance with the rules on the automatic exchange of information in the area of taxation, resulting from the legal and regulatory framework (e.g. FATCA, CRS) or in the context of anti-money laundering.

For the fulfilment of the obligations under d) – g) above, the Bank may transfer your personal data to competent national authorities for them in turn to process and/or forward them to the respective authorities of third countries.

8. Your Data Protection Rights

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. You have the right to request the correction and/or completion of your personal data. 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 (right to be forgotten). 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 distinct case 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.C. below, you have the right to request the review of such rejected request, with human intervention.

9. How to Exercise Your Data Protection Rights

If you wish to exercise one of your aforementioned rights listed under paragraph 8, you may contact the Bank through the following channels:

a) at the Bank's branch network, by filing in the relevant request form "Application for Data Subject Requests";

b) Electronically on the Bank's website www.alphabank.com.cy, by completing the electronic application form «Application for Data Subject Requests", available in the following link: www.alphabank.com.cy/en/individuals/support-center/application;

c) Via email to dpo@alphabank.com.cy

In case of submission of a request to exercise your rights, the Bank shall respond to your relevant request within thirty (30) days of receipt. The time limit may be extended by further sixty (60) days, due to the complexity of the request or the receipt of multiple requests. In the case of an extension, you shall be informed accordingly within thirty (30) days of receipt of the request.

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, excessive or repetitive.

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. Failure to Provide Personal Data

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. How 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 determining the credit risk (e.g. approval or change of financial limit, debt settlement, etc.) that the Bank is required to undertake or that it has undertaken and for as long as the risk exists (credit profiling). To this end, the Bank processes data related to your income, assets and marital status, your transactional behaviour, the consistency in the financial obligations that you undertake and your credit scoring.

- For promotional purposes of Bank's products and/or services, provided that you have given your consent to the Bank (marketing profiling). In this context, the Bank processes personal data with respect to 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, data from the execution of transaction payments or transactions through the Bank in general.

B. Automated processing – artificial intelligence

The Bank may process the aforementioned personal data by automated means and/or utilize artificial intelligence systems for such processing, in accordance with the applicable legal and regulatory framework governing such activities.

C. Automated individual decision making

The Bank may carry out automated individual decision-making, including profiling as referred to in paragraph A above, in accordance with Article 22 of the GDPR.

In any event, you have the right to object to automated decision-making and to request that any decision resulting in the rejection of your application be reviewed with human intervention.

12. How to Make 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: www.dataprotection.gov.cy.

13. Cookies

When you visit the Bank’s website, our systems automatically collect certain information relating to your visit, such as the type of browser you use, your IP address, and the website from which you were redirected to the Bank’s website. You may configure your browser not to accept cookies from the Bank’s website and to delete cookies either automatically or manually. However, in such a case, it may not be possible to fully utilize all the functions and services provided through the Bank’s website.

For more information on how cookies are used, you may refer to the Bank's Cookies Policy, which is available on the Bank's website, www.alphabank.com.cy, at the following link: www.alphabank.com.cy/en/pages/cookies-policy.

14. Updates to This Privacy Notice

We may amend this privacy notice from time to time. In the event of any amendment, we will provide appropriate notice and update its issue date accordingly. The revised version of the privacy notice will be available at the Bank’s branches/business units, as well as on the Bank’s website, www.alphabank.com.cy. We encourage you to review the privacy notice periodically to stay informed about the ways in which the Bank protects and processes your personal data.

Date: 16/11/2026