

Notice on the Processing of Personal Data in accordance with the General Data Protection Regulation (GDPR)

In its capacity as controller, BETA Securities SA (hereinafter the “Company”) hereby informs you that, pursuant to Regulation (EU) 2016/67 and the provisions of the relevant Greek legislation on the protection of personal data, in its capacity as controller that it collects and processes your personal data, either the submission of an application for the provision of a product or provision of a service, or subsequently including those arising from the conclusion and operation of a contract/contracts with the Company, or in the context of general relations and transactions with the Company, in accordance with the following.

The general principle we follow is that your personal data is very important to us and we protect it with respect for your privacy. We implement effective measures to protect your personal data in compliance with the General Data Protection Regulation.

1.The personal data collected by the Company and its source.

- a) Your identification data: first name, last name, social security number, VAT number, date of birth, gender, etc. This data is collected directly from you and/or from publicly accessible sources.
- b) Your contact data: postal and email address, landline and mobile phone, etc. Data is collected directly from you and/or from publicly accessible sources.
- c) Data about your financial and property situation, occupation, earnings, evidence of the origin of funds (e.g. real estate sales contracts, documents for the acquisition of assets through inheritance or will, bank statements, additional bank statements from past years) This data is collected either directly from you or at your behest and/or from publicly accessible sources.
- d) Data demonstrating the client’s trading behavior in the provision of investment services as required by relevant legislation
- e) Recording data of conversations and communications (e.g. telephone, live, electronic) after your prior notification, in accordance with the legal conditions.
- f) Data from the use of the Company's electronic and/or digital products and services (e.g. cookie identifiers, Internet Protocol addresses (IP addresses), location data or other online identifiers, according to their more specific conditions.
- g) Data collected compulsorily during the process of completing the Contact Form available on the company's website betasecurities.com/ (name, surname, email) for submitting the above.
- h) Image data from the video recording systems of the Company's premises, where there are the relevant legal markings.
- i) Payment transaction data, which is collected either by you or by your chosen payment service provider.
- j) Data regarding your investment profile, which includes data and information about: i) your knowledge and experience (with references to past trading activity), ii) your investment objectives, risk profile and your tolerance for losses, iii) your financial condition and ability to bear the brunt of possible financial losses due to your investments. This data is collected

directly from you, depending on the investment service provided to you or the investment product to which it relates.

In the meaning of the above collection of the data by you also includes the collection by a third party acting on your behalf as well as by a customer or prospective customer related to you (natural or legal person).

Also, in the event that you provide us with personal data of third parties, you should have secured their relevant consent and have referred these persons to the Company's present information.

2. Purpose of collection and processing of your data.

The Company collects and processes your personal data:

A. To perform a contract and take steps at your request before entering into a contract.

The processing of the above (under 1) data serves purposes such as:

- a) Your identification and communication with you during the stage of both the pre-contractual and contractual relationship with you, as well as any other transactional relationship you have with the Company.
 - b. To conclude a contract with the Client, to execute it and to generally ensure the smooth operation and fulfillment of the Company's obligations to the Client.
 - c) The evaluation of the suitability and compatibility of the products and the suitability of the services provided as well as your information.
 - d) In the case of granting credit for the purchase of securities for:
 - i. the evaluation of the credit risk that the Company is required to undertake or has already undertaken,
 - ii. monitoring the progress of the debt,
 - iii. preventing or limiting the possibility of defaulting on your obligations under the contract(s) you will enter into with the Company and
 - iv. the pursuit of the collection of any sums owed to the Company from the operation of the contract(s) you will enter into with the Company.
 - e) Communicating with you, informing you about the best use of the products and/or services provided by the Company, for their improvement, as well as for sending you questionnaires to investigate your degree of satisfaction with the products and the services provided by the Company, as well as the level of service you receive from the Company.
- The said (under A.) processing also serves the Company's compliance with its legal obligations (below under B.), as well as the legal interests of the Company or a third party (below under C.)

B. For the Company's compliance with its legal obligations.

The said processing of the data under (1) serves purposes such as:

- a) The prevention and suppression of money laundering and the financing of terrorism, as well as the prevention, detection and suppression of fraud against the Company or its other customers, as well as any other illegal act.
- b) The Company's compliance with the obligations imposed by the current legal, regulatory and supervisory framework, as well as the decisions of any authorities (public, supervisory, etc.) or courts.
- c) The protection of customers and employees and their property, as well as the Company's facilities and property in general.

The said (under B.) processing also serves the legal interests of the Company or a third party (below under C.).

C. For purposes of legitimate interests of the Company or a third party.

The aforementioned processing of the data under (1) serves purposes such as the security of the Company's IT systems, facilities and assets, the prevention and prevention of criminal acts or fraud, the evaluation of the credit risk undertaken by the Company, the defense of legal rights and interests of the Company, informing and/or marketing products and services that we consider to be of interest to you provided you have given us your consent to such promotions. This processing is preceded by a weighting that compared to the interests of the Company, your interest or fundamental rights and freedoms that require the protection of your data do not prevail.

3. Recipients of your data.

When fulfilling the Company's contractual and legal/regulatory obligations, serving its legal interests, as well as in cases where the Company is authorized or has received your consent, the recipients of your data are, for example, the following:

- a) The employees of the Company who are responsible for the evaluation of your requests, the management and operation of your contract/contracts with the Company, for the fulfillment of the resulting obligations as well as the relevant obligations imposed by law.
- b) Entities to which the Company entrusts the execution of specific tasks on its behalf (executors of processing) such as, indicatively but not limited to, lawyers, law firms, notaries and bailiffs, providers of IT products and/or services and/or support of any kind information and electronic systems and networks including online systems and platforms, storage companies, archiving, management and destruction of files and data, customer satisfaction or market research in general, promotion of products and/or services, etc., provided that the security conditions and the privacy.
- c) Credit institutions, payment service providers or entities that must intervene to execute contracts with you or transactions that you requested or activated.
- d) Supervisory, independent, judicial, prosecuting, public and/or other authorities or bodies or parties that have been assigned control/monitoring of the Company's activities within the framework of their responsibilities.
- e) For the data relating to or resulting from the completion of investment transactions and the provision of investment services in whole or in part, credit institutions, systematic internalisers, investment companies or third market intermediaries, Custodians domestic and/or foreign, Administrators of trading venues, such as Hellenic Exchanges-Athens Stock Exchange (ATHEX) or the Central Securities Depository, Operators of clearing and settlement systems for stock market instruments, as well as other systems and/or mechanisms for the completion of these transactions, Hellenic Deposit & Investment Guarantee Fund (H.D.I.G.F), Transactions Reporting Services (ARM), Consolidated Tape Provider (CTP) and Trade Reporting Services (APA), by the Athens Exchange and in general anybody involved in information on the specific category of transactions and their processing.

5. Transfer of Data to Non-EU Countries

The Company may transfer your personal data to third countries, outside the EU, in the following cases:

- a) an adequate level of protection is ensured according to the European Commission by the third country, by territory or by one or more specific sectors in that third country or

b) appropriate guarantees have been provided for their processing by the recipient, based on the law.

In case none of the above conditions apply, a transfer can only take place if:

- a) you have provided the Company with your express consent to this end or
- b) the transmission is required for the execution of your contract with the Company, such as for the execution of your orders, in which case your data necessary for this purpose will be transmitted to the bodies that must intervene or
- c) the transmission is necessary for the establishment or exercise of legal claims or the defense of the Company's rights or
- d) there is a relevant obligation of the Company from a provision of the law or an international agreement or
- e) in the context of the Company's compliance with the rules of the automatic exchange of information in the tax sector, as they derive from Greece's international obligations.

In order to fulfill the obligations under d or e above, the Company may proceed with the transmission of your personal data to competent national authorities in order to be forwarded through them to the respective authorities of third countries.

5. Your consent

In cases where we have asked you and received your consent, the processing of the data under (1) is based on this consent. In these cases, you have the right to withdraw your consent at any time, without, however, affecting the legality of the processing based on your consent before its withdrawal.

6. Profiling or Automated Decision Making.

To fulfill the above purposes, as well as for promotional purposes, the Company may compile your profile using your data under (1).

In cases where the Company makes a decision solely on the basis of automated processing, including profiling, which produces legal effects that concern you or significantly affect you in a similar way, it will provide you with more specific information and, where necessary, ask for your consent.

7. Time period of keeping your data

Where a contract is concluded with the Company, the latter will keep the Client's personal data until the completion of the statutory limitation period of the claims, i.e., for a period of up to twenty (20) years from the expiration of the relevant contract in any way. If, until the expiry of the above period court proceedings, which directly or indirectly involve the Client are in progress with the Company or any company affiliated with it, the aforementioned data retention period will be extended until the issuance of an irrevocable court decision.

In case that you do not enter into a contract with the Company, your personal data will be kept for up to five (5) years from the rejection of the relevant application.

In the event that a shorter or longer retention period for your data is provided by law or regulatory acts, the above retention period will be reduced or increased accordingly.

The contractual documents signed by the Client, which contain personal data, may, at the Company's discretion, be kept in electronic/digital format after a five-year period.

8. Rights of the data subjects

You have the following rights:

- a) Be informed of the categories of your personal data that we keep and process, their origin, the purposes of their processing, the categories of their recipients, their retention time, as well as your relevant rights (right of access).
- b) Request the correction and/or completion of your personal data, in order to be complete and accurate (right to correction), by providing any necessary document from which the need for correction or completion arises.
- c) Request the restriction of the processing of your data (right to restriction).
- d) Oppose to any further processing of your personal data held by us (right to object).
- e) Request the deletion of your personal data from the files we keep (right to be forgotten).
- f) Request the transfer of your data from the Company to any other controller (right to data portability).

Please note the following in relation to your above rights:

- i. Your rights under points (c), (d) and (e) may not be satisfied, in part or in whole, if they concern data that is necessary for the conclusion or continuation and performance of the contract, regardless of whether they were granted by the Client or obtained from any public source
- ii. In any case, the Company has the right to refuse your request to limit the processing or delete your personal data if the processing or keeping of the data is necessary for the establishment, exercise or support of its legal rights or the fulfillment of its obligations.
- iii. The exercise of the right to portability (above under point f) does not entail the deletion of the data from the Company's records, which is subject to the conditions of the immediately preceding paragraph.
- iv. The exercise of the above rights acts for the future and does not relate to already performed data processing.
- g) Submit a complaint to the Hellenic Data Protection Authority (www.dpa.gr), if you believe that your rights are violated in any way.

9. Exercising your rights

To exercise your rights, you may contact to the company at the address BETA SECURITIES SA. 29 Alexandras Avenue, P.O. 11473, Athens, to the attention of the Data Protection Officer or by e-mail at dpo@beta.gr

The Company will make every effort to respond to your request within thirty (30) days of submission. This deadline can be extended for an additional sixty (60) days, if this is deemed necessary at the absolute discretion of the Company, taking into account the complexity of the request and the number of requests. The Company will inform you in any case of extension of the deadline within thirty (30) days.

The above service is provided by the Company free of charge. However, in the event that the customer's requests are manifestly unfounded, excessive or the Company may either impose a reasonable fee to the Customer by informing him/her accordingly, or refuse to respond to such requests.

Please before taking any action to approach the Data Protection Authority by contacting us using the contact details listed above, as it would be better for our relations and for the improvement of our services, to give us the opportunity to hear the concerns directly and do our best to manage them.

10. Protection of your personal data

The Company implements appropriate organizational and technical measures for the security of your data, ensuring its privacy, its processing and its protection against accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access and any other form of unlawful processing

This notice addressed to Clients is based on our Company's obligation to implement and comply with the General Regulation (EU) 2016/679 of the European Parliament and of the Council, and the other provisions of the Greek legislation on the protection of personal data which are adopted and implemented in this context and replaces any prior notice made in the context of Law 2472/1997 and which may refer to the Company's contractual or other documents.

Contact Details

(A) Data Controller

BETA Securities SA

Address: 29 Alexandras Ave, Athens 11473, Athens, Greece

Telephone number: 210 6478900

Email: info@beta.gr

(B) Data Protection Officer

Address: 29 Alexandras Ave, Athens 11473, Athens, Greece

Telephone number: 210 6478900

Email: dpo@beta.gr