

**Privacy Policy in relation  
to the 3Dsecure mobile application of Eurobank Limited  
(the “Privacy Policy”)**

Eurobank Limited (“We” or “Eurobank” or the “Bank”) is committed in safeguarding the privacy of the personal data you share with it and/or with its employees and/or agents. The Bank will protect and use your personal data in the appropriate way as indicated by this Privacy Policy, the General Terms Governing the Relationship between Customer-Bank, as amended and in force from time to time, and the provisions of the current legislation, including but not limited to the EU General Data Protection Regulation 2016/679 (“GDPR”) and Law 125(I)2018 providing for the protection of natural persons with regard to the processing of personal data and for the free movement of such data, as amended or re-enacted and in force, from time to time.

The General Terms Governing the Relationship between Customer-Bank can also be found at the Bank’s website [www.eurobank.cy](http://www.eurobank.cy).

Please read this Privacy Policy carefully since it explains who the data controller of your personal data is, the purpose and the legal grounds for processing your personal data, who has access to your personal data, how long your personal data is retained and what are your rights in reference to the processing of your personal data.

**1. Who processes your personal data**

The data controller of your personal data is Eurobank Limited (Reg. No. HE6771) hereinafter referred to as the “Bank” with registered office at 200 Lemesou & Athalassas, Strovolos, 2025, Nicosia, Cyprus.

If you have any questions or require further information, about how we use your personal information, you can contact our Data Protection Officer (“DPO”) by email at [dpo@eurobank.com.cy](mailto:dpo@eurobank.com.cy) or via the ‘Contact Us’ form located at our website.

**2. What is the purpose and legal grounds for processing your personal data**

Your personal data will be processed in the context of our contractual relationship and as described herein below, for the provision and proper functionality of the Eurobank CY Cards Authenticator Application (the “Mob App Authenticator”) service.

We process your personal data in accordance with the provisions of the GDPR and any applicable law on the basis of the below:

- **Article 6, paragraph 1(b) of the GDPR: for the fulfilment of contractual obligations**  
the processing of personal data is carried out for the fulfilment of the obligations under the agreements between the Bank and yourself and/or for the provision of services and/or products of the Bank you are using.

- **Article 6, paragraph 1(c) of the GDPR: for the fulfilment of legal obligations**  
the processing of personal data may be necessary for the purpose of fulfilling various legal obligations as derived by the applicable legal framework.

- **Article 6, paragraph 1(f) of the GDPR: for the protection of legitimate interests**  
where required, we process your data beyond the actual performance of our contractual obligations for the purposes of the legitimate interests pursued by us or by a third party.

**3. Collection of personal data**

The Bank collects the following types of information through the Mob App Authenticator :

- a) personal information,
- b) contact details,
- c) card account information
- d) anonymous information.

In addition to the above, it is noted that for the effective operation of the Mob App Authenticator the following personal data and/or information are collected and processed by the Bank:

- (a) Date of birth and telephone number for identification purposes;
- (b) Card number to execute the requested transactions;
- (c) IP address and device ID for investigating potential malicious activities and protect you against fraud.

Before installing the Mob App Authenticator permissions are requested for accessing:

Anonymous information means information that does not directly or indirectly identify, and cannot reasonably be used to identify, a particular individual. Specifically, we select information about your mobile device's operating system to ensure that the Mob App Authenticator functions properly and that you do not face any technical difficulties.

#### **4. How long your personal data is retained**

The Bank will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy and in the General Terms Governing the Relationship between Customer-Bank, as amended and in force from time to time, unless a longer retention period is required or permitted by law. The Bank will hold your personal data for up to 10 (ten) years once our business relationship has ended, in accordance with the relevant directives of the Data Protection Commissioner (<http://www.dataprotection.gov.cy>).

#### **5. What are your rights in reference to the processing of your personal data**

You have the following rights concerning the data the Bank controls and processes:

- (a) to be informed about how we use your personal information and your rights. This is why we are providing you with the information in this Privacy Policy (**right to be informed**).
- (b) to be aware of the categories of your personal data that the Bank maintains and processes, their origin, processing purposes, recipients, retention period of your personal data and to receive a copy of your personal data processed by the Bank (**right of access**).
- (c) to request correction of your personal data that the Bank holds about you in order for such data to be complete and accurate (**right of rectification**), by producing any necessary document based on which the need for correction or completion arises from.
- (d) to ask for restriction of the processing of your data (right to restrict processing). This right can be exercised where (i) you contest the accuracy of such data; (ii) the processing is unlawful but you request that we do not delete your personal data; (iii) we no longer need to process such data but you request that we retain them for reasons connected with legal claims; (iv) you have objected to us using your personal data but you are awaiting our confirmation as to whether we have legitimate grounds to continue processing such data.
- (e) to object to any further processing of your personal data the Bank keeps and processes on the basis of our legitimate interests (**right to object**). Should you exercise this right, we will no longer process such data unless we are able to demonstrate legitimate grounds for the processing.
- (f) to ask for the deletion of your personal data from the Bank's systems and files (**right to be forgotten**). This right can be exercised where (i) we no longer need such data; (ii) you withdraw consent, provided that no other legal ground for processing applies; (iii) you object to us using your personal data in order to pursue our legitimate interests, provided that we do not have legitimate grounds for its use; (iv) your personal data have been improperly processed; (v) we have to delete your personal data because of a legal obligation.
- (g) to request the receipt of the personal data you have provided the Bank with, or the transfer of your data from the Bank to any other controller of your data (**right to data portability**). This right can be exercised provided that (i) we process such personal information on the basis of your consent or because of our pre-contractual and/or contractual relationship and (ii) the relevant processing activities are carried out by automated means.

- (h) not to be subject to a decision based solely on automated processing (including profiling) (**right in relation to automated decision making and profiling**).
- (i) to withdraw your consent to collection and processing of your personal data (**right to withdraw consent**). In such case, the withdrawal of the consent does not affect the legality of the data processed prior to the revocation.

Please note that your rights may not be met, in whole or partly, if they concern data necessary for the establishment, exercise or defence of legal claims, or as otherwise permitted by law, irrespective of the source of their collection.

You also have the right to make a complaint at any time to the Data Protection Commissioner Office, the Cyprus supervisory authority for data protection issues (<http://www.dataprotection.gov.cy>).

## **6. Protection of your personal data**

The Bank is committed in safeguarding the privacy of the personal data and/or information you share with the Bank and/or with its employees and/or agents and/or associates. The Bank applies procedures and measures to safeguard and to provide reasonable protection of your personal data against loss, misuse, unauthorized access, disclosure and alteration. The data processing is conducted solely by persons who are under the control of the Bank, and only at its guidance.

## **7. Disclosing your personal data to third parties**

The Bank shall not disclose to the third parties personal data, except from the following cases:

- (a) where the Bank is required or permitted to do so by law and/or applicable legal framework or any directive or instructions issued by the Central Bank of Cyprus by virtue of any law, and/or
- (b) where disclosure is made in court proceedings, and/or
- (c) to third parties carrying out authentication services (i.e push notification service) on behalf of the Bank, and/or
- (d) as indicated and/or explained in the General Terms Governing the Relationship of Customer – Bank available at the Bank's website [www.eurobank.cy](http://www.eurobank.cy), as amended and in force, from time to time

The Bank will only transfer personal data where the agent or contractor has provided written assurances to the Bank that it will protect any personal data disclosed to it in accordance with the Bank's policies and the applicable legal framework.

## **8. Changes to this Privacy Policy**

This Privacy Policy sets out information as to how we look after your personal information for the purposes of the GDPR and should be read in conjunction with the General Terms Governing the Relationship of Customer – Bank, as amended and in force, from time to time. The Bank may modify this Privacy Policy from time to time in order to reflect its current practices and/or in accordance with any changes in the applicable legal framework. In any case, you are invited to periodically visit the Privacy Policy which can be found within the Mob App Authenticator.