PRIVACY NOTICE

Last updated March 2019

Eurobank Cyprus Ltd ("the Bank") wishes to inform you why and how the Bank collects and processes your personal data as well as of your rights under local data protection law and the EU General Data Protection Regulation ("GDPR").

For the purposes of this Privacy Notice, the terms "personal data", "data" and "personal information" are used to refer to any information relating to you that identifies or may identify you, such as your name or contact details. The term "processing" is used to collectively refer to actions such as the collection, retention, use, disclosure, transfer, deletion or destruction of personal data.

1. WHO IS RESPONSIBLE FOR DATA PROCESSING?

The Bank is a licensed credit institution, incorporated and established in accordance with the laws and regulations of the Republic of Cyprus, with company registration no. 217050 and with registered address at 41 Arch. Makarios III Avenue, 1065 Nicosia.

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 or via the 'Contact Us' form located at our website (https://www.eurobank.com.cy/en/contact/contactUs).

Eurobank Cyprus Ltd is part of Eurobank S.A. Group. Each entity of the Eurobank S.A. Group has its own separate privacy notice. Such entities maintain their own websites that may be linked to our website. If you are interested in learning about how such entities process your personal data, please refer to their corresponding privacy notices, which may be found on their websites.

2. WHAT TYPES OF PERSONAL DATA THE BANK COLLECTS AND PROCESSES?

When you visit the Developer Portal, we collect and process the following information:

- Internet protocol (IP) address used to connect your computer or device to the Internet
- Browser type and version
- Device type and operating system and platform

This information helps us provide an online experience that matches your device and effectively manage your interaction with our APIs and the Developer Portal.

We also collect the following Personal Information when you register to the Open Banking Enrolment form:

- First Name
- Last Name
- Email address
- Credentials; username and encrypted password

3. WHY AND WITH WHOM THE BANK SHARES YOUR PERSONAL DATA?

Your personal data are only processed by the Bank's units and/or persons that are authorised to process them, given that it is necessary to do so for the fulfillment of our contractual and legal obligations, or where you have given us your consent to process them, or where we believe that it is necessary for our legitimate interests to do so.

Your data may also be shared with the Group, the service providers and suppliers with whom the Bank has contractual agreements, pursuant to which they are bound to act only as per the written directions of the Bank, or where you have given us your explicit consent.

4. HOW LONG THE BANK RETAINS YOUR PERSONAL DATA

We will retain information collected about you through the Developer Portal for as long as is necessary for the fulfillment of the above purposes.

5. HOW DO THE BANK USE YOUR PERSONAL DATA

We use your Personal Information collected from the Developer Portal in order to:

- Perform our obligations under the Developers' Terms and Conditions, including responding to your requests
- Comply with our legal and regulatory obligations
- Pursue our legitimate interests concerning in particular the following areas:
 - the security of the Developer Portal
 - the verification of your identity
 - the improvement of our API services

6. HOW DOES THE BANK PROTECT 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. WHAT ARE YOUR RIGHTS FOR THE PROTECTION OF YOUR DATA

You can exercise your rights as it is described in the General Privacy Notice of the Bank at: <u>https://www.eurobank.com.cy/en/articles/privacy-policy</u>

8. CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice sets out information as to how we look after your personal information for the purposes of the GDPR and to replaces any existing circular or document in association with the information provided in this Privacy Notice. The Bank may modify this Privacy Notice from time to time in order to reflect its current practices and/or in accordance with any changes in the applicable legal framework. In such a case, the Bank will update the revision date at the top of the page