

Privacy Policy of ePOS Website

This Privacy Policy concerns the conditions for the collection, storage, use, and processing of your personal data by the company "DIATRAPEZIKA SISTIMATA S.A." (hereinafter referred to as the "Company"), with headquarters in Maroussi, Attica, 2 Alamanas St., tel. +30 210 6171600, email: info@dias.com.gr, when you visit or use the ePOS website (hereinafter referred to as the "website"), as well as when you enter personal data on the website in order to execute a payment/transaction. This Privacy Policy applies exclusively to the personal data of individuals. For any questions, please do not hesitate to contact us.

1. About the Website

The website provides electronic payment services. During your navigation on the website, you provide the Company with personal data, which is processed by the Company.

2. What is Personal Data?

The term "personal data," as used in this Privacy Policy, refers to information of individuals, either private or professional, through which their identity can be determined.

The personal data collected may include, indicatively and depending on the device through which you make your payment (browser, mobile device, etc.):

- a) The name on the card, as well as a phone number and/or email address that you provide for payment processing.
- b) Data related to the device you use (IP address, other identifying device parameters, screen height and width of the browser).
- c) Electronic payment data (e.g., card number, payment amount, payment timestamp).
- d) Other data (e.g., data collected through cookies).

The Company collects and processes your data exclusively for the purposes of the services provided on the electronic website. Specifically, for the data categories under (a) to (c), the Company acts as the Processor and processes your personal data according to the instructions and on behalf of your Bank, the acquirer accepting the payment order, or the beneficiary organization, depending on the processing, for the purpose of safely completing electronic payments. The personal data of category (d) is processed by the Company as the Controller, for the protection of the website and the security of visitor navigation. More details on the purposes of processing this data category can be found in the Cookies Policy and the cookies banner.

3. Processing of Personal Data

The processing of Personal Data involves collecting, recording, organizing, storing, adapting, altering, retrieving, searching for information, using, transmitting to third parties, disseminating, associating, combining, restricting, deleting, and destroying the Personal Data of individuals.

4. Legal Basis for Data Processing by the Company

The processing of personal data of website users related to electronic payments is carried out to properly and securely complete your transaction, based on the contractual relationship of the Company both with the payment beneficiary entity and with your Bank or the acquirer accepting the payment execution request. The legal basis for processing the personal data of website users, collected through cookies, is the Company's legitimate interest in the proper functioning of its website and facilitating navigation on it.

5. Who Has Access to Your Personal Data?

Access to your data is granted only to the necessary staff of the Company and affiliated businesses or Processors who are bound to maintain confidentiality. Additionally, we may transmit your Personal Data to the banks—acquirers involved in the transaction, as well as to the beneficiary organization, when deemed necessary for the execution of the above purposes. Transfers to third countries may occur if the required legal data protection safeguards are in place. All transfers are made following the instructions of the aforementioned Controllers.

The Processors and the staff, collaborators, and agents of the Company who access your personal data have contractually agreed and are bound to:

- Maintain confidentiality,
- Process the data according to the specified purposes,
- Not disclose Data to third parties without the Company's permission,
- Implement appropriate security measures,
- Comply with the legal framework for personal data protection, particularly the GDPR (EU) 2016/679.

Your Personal Data is processed and stored by the Company within the European Union unless otherwise required by law or for processing purposes and always in compliance with the conditions of applicable law.

6. Data Retention Period

The retention period varies depending on the Company's contractual obligations or the purposes of processing or the requirements imposed by the applicable regulatory framework. Data collected through Cookies is retained as specified in the Cookies Policy.

7. Data Security

The Company is committed to securely storing your Personal Data and has taken numerous technical and organizational measures to safeguard and protect the Personal Data it processes from any accidental or unlawful processing. These measures are reviewed and modified when necessary.

8. Rights of Data Subjects

Regarding the Personal Data processed by the Company, you retain the rights provided by applicable law, particularly the right to:

- Access your personal data,
- Correct and update your personal data if they are inaccurate, erroneous, or outdated,

- Erasure (Right to be forgotten) and withdraw your consent if it is the legal basis for processing,
- Data portability,
- Restrict processing,
- Object to processing.
- Exercising Your Rights

To exercise your rights, you can contact the Company by mail (Alamanas 2, Maroussi, 15125, Athens) or by email at dpo@dias.com.gr, completing the form in Appendix A or any other method you deem preferable.

9. Response to Requests

We respond to your requests free of charge without delay and, in any case, within one (1) month of receiving your request. However, if your request is complex or there is a large number of requests, we will inform you within one month of any necessary extension of up to two (2) additional months, within which we will respond to you. If your requests are manifestly unfounded or excessive, particularly due to their repetitive nature, the Company may impose a reasonable fee, taking into account the administrative costs for providing the information or performing the requested action, or refuse to comply with the request.

10. Data Protection Officer

The Company has appointed a Data Protection Officer, whom you can contact regarding any matter concerning the processing of your personal data.

Data Protection Officer Contact Information:

Postal address: Alamanas 2, Maroussi, Attica, Postal Code 15125

Email address: dpo@dias.com.gr

11. Additional Information

We do not make decisions or create profiles based on the automated processing of your Data.

"Cookies" are used on our website, always after informing you, as they are necessary for the website's operation.

We do not knowingly process data of minors. If you become aware that DIAS may have received data from minors, please contact us immediately.

12. Applicable Law

We process your Data in accordance with the European General Data Protection Regulation (GDPR) 2016/679/EU and the applicable national and European legislative and regulatory framework for the protection of personal data.

13. Appeal to the Data Protection Authority

If you disagree with the processing of your personal data as described above or wish to express any complaint about it, please contact us at dpo@dias.com.gr. Furthermore, you have the right to file a complaint with the Hellenic Data Protection Authority (postal

address: 1-3 Kifisias St., Postal Code 115 23, Athens, email: contact@dpa.gr), if you believe that the processing of your personal data violates applicable law.

This Privacy Policy will be updated according to the applicable legal framework. We encourage you to read this Policy regularly to be informed about how your Data is protected

Personal Data Request Form

To: INTERBANKING SYSTEMS S.A.

Date: _____

Personal details of the person submitting the request:
First and Last Name:
Mail Address:
Contact details:
Relation to the Company:
Further information:

I hereby exercise my legal right to:

- Access my personal data
- Rectification/ Amendment/ Update of my personal data
- Restriction of processing my personal data
- Personal data portability Personal data erasure (right to be forgotten)
- Object to processing of my personal data
- Withdraw my consent

Detailed description of the request:

I wish DIAS to contact me and respond to my request:

- Via e-mail (please fill your email address):
- By post mail (please fill your address, city, region, postal code, floor etc.):
- Other way (please provide further information):

I hereby declare that the information provided in the present request form is accurate.

Personal Data Notice DIAS responds to your requests in compliance with the provisions set by the Law (esp. GDPR) and the Company's Personal Data Policy. The Company's Personal Data Policy is published on DIAS's website. In case that the information provided in the present form is not sufficient for the fulfillment of your request, DIAS may ask you to provide it with further information/documents. DIAS will retain the submitted request form for a period of 12 months upon its receipt. Your personal data provided to the Company through the present form is being processed by DIAS for the purpose of your request's fulfillment and other legitimate purposes as mentioned in DIAS's Personal Data Policy and the applicable legislation. Your rights to access, rectification, erasure, restriction, portability, object and complaint filing before the Greek DPA concern this personal data as well. For further information concerning your personal data processing, you may contact the Company's DPO (dpo@dias.com.gr, Alamanas 2 Str., Marousi, 15125)

The applicant

(Signature)