## **Privacy Policy**

This Privacy Policy applies in cases that the Company "Interbanking Systems S.A.", based in Maroussi, Alamanas 2 St., tel. 210-6171600, e-mail info@dias.com.gr (the "Company" or "DIAS"), collects and processes your personal data, when you visit the present website as well as when you provide it with personal data through the present website in order to proceed to a payment. The Privacy Policy applies only to natural persons. For any questions, please do not hesitate to contact us.

#### 1. Initial information.

The website epos.dias.com.gr provides electronic payment services. During your navigation on the present website, you provide the Company with personal data that is subject to processing by DIAS.

#### 2. What is personal data?

The term "personal data", as used in this Policy, refers to information of any natural person, whether individuals or professionals, which can be used to identify them.

Personal data collected through the present website may be:

- a) personal and contact information
- b) electronic payment details (card number, payment code, customer code, amount and time of transaction, Bank)
- c) other information (IP address, personal data collected via cookies).

Dias collects and processes your personal data solely for the purpose of offering electronic payment services through the present website. DIAS processes personal data under categories (a) and (b) as stated above, as Data Processor on behalf of your Bank or the beneficiary Organization (Data Controller), aiming to secure completion of electronic payments. DIAS acts as Data Controller for processing personal data under category (c) aiming to its website security and visitors' security. You may find more information on the purpose of processing personal data under category (c) by visiting DIAS's Cookie Policy.

#### 3. Personal Data Processing.

Processing of Personal Data is the collection, registration, organization, storage, adaptation, modification, retrieval, search of information, use, transmission to third parties, dissemination, association, combination, restriction, deletion and destruction of Personal Data.

### 4. Personal data processing purpose & legal basis.

DIAS processes personal data of its website visitors concerning electronic payments for the purpose of ensuring secure and proper completion of your transaction, based on the contractual relationship between DIAS and the Data Controller.

The legal basis for processing personal data collected via cookies is DIAS's legitimate interest concerning proper and secure functionality of the website and facilitation of users' navigation.

#### 5. Who may access your personal data.

Access to your personal data is granted to DIAS's employees or partners (sub-processors) according to the principle of data minimization under the condition that these persons are contractually bound to protect the confidentiality of personal data. Moreover, DIAS may transfer your personal data to Banks that are

involved in the transaction (Bank of the payer and the payee) as well as to beneficiary organizations, for the purposes mentioned above. DIAS transfers your personal data according to the instructions it receives from the Data Controller.

Data sub – processors as well as DIAS's personnel and partners that may have access to your personal data are contractually bound to:

- Protect the personal data confidentiality,
- Process personal data for specific purposes,
- Not share personal data with third parties unless they have DIAS's written permission,
- Take proper technical measures to ensure personal data security,
- Comply with the applicable legislation concerning personal data protection and especially with the European Regulation 2016/679 (GDPR).

Your personal data is subject to processing by DIAS within the European Union unless otherwise provided by the law or the processing purposes. In any case, processing takes place in accordance with the conditions set by the applicable legislation.

#### 6. Retention Period.

Your personal data retention period depends on DIAS's legal or contractual obligations. Personal data collected through cookies is retained as stated in the Cookie Policy.

## 7. Personal Data Security.

DIAS ensures personal data security and thus it has taken proper technical and organizational measures to protect personal data from any non-legitimate use. Such measures are regularly reexamined and altered in order to comply with security requirements.

## 8. Data subjects' rights.

Data subjects may contact DIAS in order to exercise their legal rights concerning their personal data. More specifically, you have the following rights:

- Right of access
- Right of rectification
- Right to erasure (right to be forgotten).
- Right to restriction of processing
- Right to data portability
- Right to object
- Right not to be subject to automated decision-making, including profiling
- Right to consent withdrawal in cases where consent constitutes the legal basis for the processing

#### 9. Exercising your legal rights.

You may exercise your rights by contacting DIAS either via post mail (2 Alamanas St., Maroussi, Greece, 151 25) or via email (<a href="mailto:dpo@dias.com.gr">dpo@dias.com.gr</a>), by filling in the following form or by any other means or method that you consider appropriate.

#### 10. Response to your requests.

DIAS responds to your requests under the requirements set by the applicable legislation and the European Regulation 2016/679. DIAS responds to your requests free of charge and without undue delay, in any case within one (1) month of receiving your request. This period may be extended for two further months if necessary. In this case, DIAS informs data subjects about the reasons of the delay within one (1) month of receiving your request. In case that your request is manifestly inadmissible or excessive, DIAS may charge you a reasonable fee or refuse to respond to your request.

#### 11. Data Protection Officer

If any questions or complaints arise regarding this Policy and in order to exercise your rights, you may contact the Company's DPO Office.

Email address: dpo@dias.com.gr

Telephone no: 210 6171600

Postal address: 2 Alamanas Str., Marousi, PC 15125.

#### 12. Further information.

We do not make decisions or profiling based on automated processing of your Data.

Cookies is used on our website epos.dias.com.gr, only after you have been informed and agreed (except for essential cookies).

DIAS does not process minors' personal data, unless the person that has their custody has expressly given consent to. The current website is neither designed nor intended to be used by anyone under the age of 18. In case that you are under the age limit you are strongly encouraged to refrain from any action of providing your personal data to DIAS. If you believe that DIAS has collected your personal data, you should inform the person that has your custody in order to legitimately exercise your rights.

## 13. Applicable Law.

We process your personal data according to the European Regulation (EU) for personal data protection 2016/679/EE and to the applicable domestic and European legislation.

## 14. Expression of complaints to the Data Protection Authority.

If you disagree with the above processing of personal data, please contact DIAS's DPO as stated above.

Furthermore, you have the right to submit a complaint to the Personal Data Protection Authority (postal address Kifisias 1-3, P.C. 11523, Athens, email address: contact@dpa.gr), if you consider that the processing of your Personal Data violates the applicable law.

This policy will be updated in accordance with the applicable regulatory framework. We encourage you to read this Policy regularly in order to be informed on how your Data is protected.

# **Personal Data Request Form**

To: Interbanking Systems S.A.	Date:
Personal details of the person su	ibmitting the request:
First and Last Name:	
Mail Address:	
Contact details (phone number/email):	
Relation to the Company:	
Further information:	
I hereby exercise my legal right to:	
□ Access my personal data	
□ Rectification/ Amendment/ Update of my personal data	I
□ 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	
Further description of the request:	
Pus and a desired and a desire	
DIAS may 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, +30 210 6171713, Alamanas 2 Str., Marousi, 15125).

The applicant

(Signature)