



BANK OF GREECE

EUROSYSTEM

BANK OF GREECE

ORDINARY GENERAL MEETING OF SHAREHOLDERS

[6 April 2026]

PERSONAL DATA PRIVACY NOTICE TO SHAREHOLDERS

PERSONAL DATA PRIVACY NOTICE TO THE BANK'S SHAREHOLDERS

The société anonyme with the corporate name **"Bank of Greece"**, having its registered office at 21 E. Venizelou St., Athens, with tax identification number (TIN) 094014213 of the Athens Tax Office for Sociétés Anonymes (FAE) (hereinafter: the "Bank"), in its capacity as personal data controller under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter: "General Data Protection Regulation" or "GDPR"), Law 4624/2019 and, in general, the personal data protection legislation for the time being in force, hereby provides the necessary information on the processing of personal data of natural persons who are or have been registered shareholders of the Bank; who have the capacity of shareholder of the Bank from time to time; legal representatives and proxies of shareholders, as well as of pledgees of shareholders; any person who holds voting rights and, in general, draws and/or exercises rights over the shares of the Bank; their representatives; the representatives of legal persons exercising voting rights on their behalf; and all persons participating in any capacity in the General Meetings of the Bank (for the purposes hereof, all the above categories of natural persons shall hereinafter be referred to jointly as "Shareholders" and each one of them as "Shareholder").

It should be noted that personal data processing means any operation or set of operations performed on personal data or on sets of personal data, whether by automated or manual means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The Bank, as the issuer of the shares, lawfully processes the personal data of Shareholders, i.e. the natural persons referred to hereinabove under said capacities, always for legitimate and lawful purposes, observing the principles of fair and transparent processing, by implementing appropriate technical and organisational measures, in compliance with the requirements of the GDPR and the applicable legislative framework, its guiding principle and primary concern being to safeguard and protect the personal data and fundamental rights of data subjects.

On the basis of the above, the Bank, in accordance with the principle of transparency, hereby notifies Shareholders of the terms and conditions governing the processing of their personal data.

(I) What types of personal data does the Bank process and where does it collect them from?

The personal data of the Shareholders collected and processed in general by the Bank in the context of managing and servicing the shareholder capacity and in order to carry out the tasks governing the said shareholding relationship are those that are absolutely necessary, adequate, relevant and limited to what is required in relation to the purposes for which they are processed.

The types of Shareholder personal data that the Bank processes to fulfil lawful processing purposes are the following:

- (a) identification data and documents, such as name and surname, father's name, spouse's name, date of birth, number and copy of identity card or passport or other equivalent document, tax identification number (TIN), competent tax office (DOY), country of tax residence, any special tax treatment, occupation/activity, citizenship and other demographic data;
- (b) contact information, such as postal and e-mail address, landline and mobile telephone number;
- (c) bank account number;
- (d) number and type of shares;
- (e) Investor Share Code Number in the Dematerialised Securities System (DSS), Securities Account in the Dematerialised Securities System (DSS) and Shareholder Register Number;
- (f) data originating from correspondence with Shareholders;

(g) data on the capacity in which the Shareholder participates in a General Meeting of the Bank and the relevant documentation, evidence of shares and rights held thereon, information on trading activity in shares;

(h) data relating to Shareholders' participation and exercise of voting rights in General Meetings of the Bank, information regarding any requests by Shareholders submitted to the Bank from time to time, signatures of Shareholders and, in general, any other information provided pursuant to the applicable provisions on markets in financial instruments.

These personal data are collected either directly from the Shareholders – for the performance of tasks concerning them –, who are responsible for updating their details so that the Shareholders' Register remains up to date and accurate, or from third parties authorised by the Shareholders, or from the société anonyme with the corporate name "Hellenic Central Securities Depository S.A.", which, in its capacity as operator of the Dematerialised Securities System (DSS), maintains Shareholders' identification data and other information relating to the Bank's shareholder structure as well as transactions in shares, which are provided to the Bank in electronic form, in accordance with the provisions of the legislation in force and the Rulebook of the Hellenic Central Securities Depository.

(II) What are the purposes of personal data processing?

The Bank collects Shareholders' personal data in accordance with the above and processes them in general for lawful processing purposes and always on valid legal grounds establishing the lawfulness of such processing. Processing is necessary for compliance with a legal obligation of the Bank of Greece (GDPR Article 6(1)(c)).

In particular, the Bank processes Shareholders' personal data to:

(a) identify Shareholders;

(b) communicate with Shareholders;

(c) verify that Shareholders can lawfully exercise their rights in accordance with the law, and facilitate Shareholders to exercise their legal rights (e.g. participate and vote and, in general, exercise Shareholders' rights in General Meetings, participate in corporate actions, dividend distribution), as well as for purposes of the Bank's own tasks (e.g. confirm shareholder capacity, draw up a list of Shareholders, keep the minutes of General Meetings);

(d) carry out and implement corporate actions (such as dividend distribution, share capital increase, etc.), notify obligated persons' transactions to the Athens Exchange, monitor transactions in the Bank's shares;

(e) fulfil its contractual obligations towards the Shareholders (such as for distribution/payment of dividends) and, in general, fulfil its obligations towards the Shareholders;

(f) comply with its legal obligations;

(g) enforce and support legal rights, protect and serve the legitimate interests of the Bank (such as in the context of legal claims of the Bank), except where such interests are overridden by the interests or fundamental rights and freedoms of data subjects that require data protection;

(h) fulfil obligations arising from tax law provisions, the Statute of the Bank and other mandatory provisions;

(i) maintain and manage a Shareholder Register, in accordance with the provisions of the legislation in force;

(j) carry out over-the-counter share transfers;

(k) publish acts and information of the Bank in the Government Gazette, on the Athens Exchange or on the Bank's website, where required by law;

(l) respond to and process requests by Shareholders in the context of services provided by the Bank (e.g. issuing of certificates), provide replies and clarifications on specific questions or requests addressed to the Bank by the Shareholders;

(m) maintain historical records of the Bank's Shareholders.

(III) Who are the recipients of the personal data?

Access to the Shareholders' personal data is restricted to Bank employees and managers, within the scope of their responsibilities and in the exercise of the duties assigned to them, in particular to those responsible for identifying the Shareholders and reviewing the lawful exercise of their rights.

The Bank shall not transmit, notify or disclose Shareholders' personal data, except to:

- (a) The société anonyme with the corporate name "Hellenic Central Securities Depository S.A."
- (b) Tax, judicial, police, public authorities and bodies within their legal mandate, duties and powers.

(IV) Personal data retention time

The period for which Shareholders' personal data are kept by the Bank, in the context of their shareholding capacity, shall be twenty years after they have ceased to be shareholders and in accordance with the current institutional framework governing the operation of the Bank.

(V) Personal data protection and security measures

The Bank has integrated into its systems, policies and internal procedures all technical and organisational measures aimed at ensuring lawfulness, fairness of processing, transparency, purpose limitation, minimisation, accuracy, data storage limitation, integrity and confidentiality and is in full compliance with all the principles that must govern the processing of Shareholders' personal data, in accordance with the GDPR and the applicable legal framework. At the same time, the Bank implements appropriate technical and organisational security measures in its systems and procedures in order to protect the confidentiality, integrity and availability of personal data as well as to protect data against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, unauthorised dissemination or access and, in general, against any other unlawful processing.

(VI) Data subjects' rights

Shareholders, as data subjects, retain, in accordance with the GDPR, the following rights, which may be exercised as appropriate:

- (a) **Right of access** to personal data concerning them, in particular the right to know which personal data concerning them are kept and processed by the Bank, their origin and the purposes of such processing, the categories of data, the recipients or categories of recipients (GDPR Article 15).
- (b) **Right to rectification** of inaccurate data and right to have incomplete data completed, so that they are comprehensive and accurate, including by means of providing a supplementary statement (GDPR Article 16).
- (c) **Right to erasure ("right to be forgotten")** of personal data, including when there is no longer a valid reason for processing, without prejudice to the Bank's obligations and legal rights to retain them under the applicable laws and regulations (GDPR Article 17).
- (d) **Right to restriction of processing**, either because the accuracy of the data is contested, or the processing is unlawful, or the controller no longer needs the personal data for the purposes of processing, provided that there are no legitimate grounds for the retention of the data (GDPR Article 18).
- (e) **Right to data portability**, under which Shareholders have the right to receive the data concerning them, which they have provided to the Bank in a structured, commonly used and machine-readable format, or to transmit those data to another controller, where the processing is based on consent and carried out by automated means and without prejudice to the Bank's legal rights and obligations to retain the data (GDPR Article 20).
- (f) **Right to object** to the processing of data relating to them, on grounds relating to their particular situation, where the processing is carried out for the purposes of legitimate interests pursued by the Bank or a third

party or for the performance of a task carried out for reasons of public interest or in the exercise of official authority (GDPR Article 21).

In addition, Shareholders, as data subjects, have the right to object to a decision of the Bank based solely on automated processing, including profiling, if it produces legal effects concerning them or similarly significantly affects them, unless there are special reasons under the applicable law.

(g) Where the processing is based on Shareholders' prior explicit consent, Shareholders reserve the right to withdraw such consent at any time, but without affecting the lawfulness of the processing based on said consent before it is withdrawn.

(h) **Right to lodge a complaint with the competent authority**, whereby Shareholders may lodge a complaint with the Hellenic Data Protection Authority (www.dpa.gr), which is the supervisory authority responsible for the protection of the fundamental rights and freedoms of natural persons, with regard to the processing of data relating to them, if they consider that their rights have been infringed in any way and that their data are processed in breach of the legislation in force, and right to a judicial remedy.

It should also be noted that, in any event, the Bank has the right to refuse to comply with a Shareholder's request where e.g. processing is necessary for the maintenance of shareholder capacity and/or the holding of voting rights, for the exercise of his/her rights as Shareholder of the Bank and/or as holder of voting rights, as well as for the establishment, exercise or support of legal rights of the Bank, for the Bank's compliance with its legal obligations or for the fulfilment of its obligations towards the Shareholders.

The Bank shall in any case have the right to refuse to erase a Shareholder's personal data if they are necessary for the purpose of maintaining historical records of Shareholders, and when the processing or keeping of the data is necessary for the establishment, exercise or support of its legal rights or the fulfilment of its obligations.

The exercise of the right to portability shall not entail the erasure of the data from the Bank's records.

(VII) How to exercise data subjects' rights

Any request by Shareholders concerning their personal data processed by the Bank and the exercise of their rights should be addressed to the Bank of Greece and, specifically, to the Data Protection Officer (email: dpo@bankofgreece.gr). In order to exercise the rights, Shareholders must fill out the relevant [Personal Data Request Form](#) and email it to dpo@bankofgreece.gr or post it to the following address:

BANK OF GREECE
21 E. Venizelou St.
ATHENS GR-10250

(To the attention of the Data Protection Officer)

The Bank's refusal or unjustified delay in meeting Shareholders' requests, in the exercise of Shareholders' rights, entitles them to appeal to the Hellenic Data Protection Authority, as the supervisory authority responsible for the implementation of the GDPR, in accordance with the above.

Based on its current data protection policy and within the current legislative and regulatory framework, the Bank may revise or amend this document.