

Pancyprian Privacy Notice for the Protection of Personal Data

July 2024

1. Introduction

This notice ("**Privacy Notice**") provides an overview of how **Pancyprian Insurance Limited (the "Company")** is Processing Personal Data of individuals. This Privacy Notice is directed and applies to you, in relation to the Processing of your Personal Data, in cases where:

- you are either an existing or potential customer of the Company (including where you have expressed your interest in/applied for the Company's products/services), or
- you are a party to the insurance policy (e.g. payor, beneficiary, named driver etc), or
- you represent a customer of the Company and/or you are an insurance intermediary/agent, or
- you are an officer, signatory, representative or beneficial owner of a company which is the Company's customer, or
- you are a guarantor or have provided any type of security to the Company in relation to the obligations of an agent of the Company, or
- you have parental responsibility or guardianship over a customer of the Company who is a minor, or
- you have been in the past any of the above (please refer to section 7), or
- you are a third party and/or witness involved at an accident scene, or
- your personal data have or may in future be lawfully obtained by the Company in the normal course of the Company's business.

Processing of personal data by the Company may take place at Group level as provided under the General Data Protection Regulation 2016/679 ("**GDPR**"), where a legitimate interest is justified. "**Group**" being **Hellenic Bank Public Company Ltd (the "Bank")** and any legal entity which is considered a subsidiary of the Bank pursuant to Companies Law Cap. 113.

For the purposes of this Privacy Notice "**Processing**" refers to any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

For the purposes of this Privacy Notice, "**Personal Data**" shall mean any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The types of Personal Data processed depends, largely, on the products and/or services you request from the Company, and that the Company agrees to provide to you, from time to time.

In all cases, the Company is committed to process your Personal Data in compliance with the provisions of applicable Personal Data protection law (including the GDPR, applicable as of 25 May 2018). Your rights under the GDPR in relation to the Processing of your Personal Data by the Company are also described in this Privacy Notice.

2. Who is responsible to process your Personal Data

Your Personal Data will be held by the Company which will be responsible for its Processing. If you wish to contact the Company in relation to the Processing of your Personal Data, you may use the following contact details:

Pancyprian Insurance Ltd
66, Griva Digeni Avenue,

Pancyprian Building,
1095 Nicosia, Cyprus
Tel: (+357) 22743743
E-mail: pancyprian@hellenicbank.com

You can reach the Company's Data Protection Officer at:
Pancyprian Insurance Ltd
173, Athalassas Avenue,
2025 Strovolos
P.O. Box 24747, 1394 Nicosia, Cyprus
E-mail: dataprotection@hellenicbank.com

3. What Personal Data is Processed and from which sources

The Personal Data Processed may be any or all of the following types:

Data type	Description
Identification data including national identification numbers	Information which can directly identify you such as name, surname, date of birth, gender, place of birth, citizenship and identification numbers or codes given or issued by a governmental service such as national social insurance number, tax identification code, ID number, passport number, driver's license number and other Personal Data of similar type.
Contact	Contact details such as telephone number, fax number, home address, work address and email address.
Financial	Information on your salary/payslip, account numbers, IBAN and other financial information.
Socio-Demographic	This includes details about your work or profession (including work location), nationality, education, marital status.
Transactional	This includes details about payments relating to your accounts with the Company, insurance claims you make, tax information and direct debit data.
Contractual	Details about the products and/or services that the Company provides to you. This includes data concerning your accounts and cards, like account number, IBAN, card number and card issuance and expiry dates. Specific information relevant to existing and/or previous insurance policies, such as policy numbers, products, premiums, properties, claims and health data, processed lawfully in line with GDPR.
Communications	What the Company learns about you from letters, emails and conversations/meetings between you and the Company.
Social Relationships	Your family, associates and other relationships you declare for the purposes of your business relationship with the Company.
Documentary	Details about you on documents in different formats, or on copies of them. This could include things like your signature, passport, identity card, driver's license or birth certificate.
Video and sound recordings	Video footages/images of security cameras recorded by the CCTV system of the Company in which you may be captured when you visit the Company, or voice call recordings when you speak with the Company.
Special categories of Personal Data	The law treats some types of Personal Data as special. These include Personal Data concerning health and data relating to criminal convictions and offences.

Data type	Description
	<p>The Company may, also, process data relating to criminal convictions and offences of its customers and persons related to its customers in relation to Insurance Fraud cases as part of the Company's initial and periodic review of its relationship with its customers, as required by law.</p> <p>The Company may, also, process medical information e.g. doctors' certificates/medical reports/medical analyses/health data in the context of an application for motor insurance, medical insurance or making a claim, including whether the insured or any third party driving the insured vehicle is suffering or has suffered in recent years from epilepsy or impaired vision or hearing or from another physical or mental illness or disability and other Personal Data of similar type. The lawful basis for Processing such Personal Data is your Consent (refer to section 4 below).</p>
Children's data	<p>For the purposes of this Privacy Notice, "children" are individuals who are under the age of eighteen (18).</p> <p>We may process Personal Data in relation to children only after we obtain their parents' or legal guardian's consent or unless otherwise permitted by law.</p> <p>Where the Company offers Information Society Services directly to a child, the Processing of the Personal Data of a child is carried out based on the child's consent if the child is above fourteen (14) years old. Where the child is below the age of fourteen (14) years, such Processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental or guardian responsibility over the child.</p>
Data relating to Accidents	Information regarding an accident, the nature of the damage or injuries, the involved persons, the witnesses.
Data relating to insurance policies	Nature of the insurance policy, details regarding the covered risks, insured amounts, insured period, termination date, payments made, payments received, payments missed.

The Company collects Personal Data from the following sources:

- Directly from you:
 - When you apply for the Company's products and services
 - When you talk to the Company on the phone or in physical presence
 - In emails and letters
 - In insurance claims or other documents
 - When it is necessary in the context of the Company's business relationship with you
 - If you take part in Company's competitions or promotions or surveys
 - When you make a complaint
- Indirectly, for example through:
 - Your authorised representatives
 - Persons/Organisations introducing you to the Company
 - Service Provider providing Personal Data of witnesses, third parties involved in the accident exchanged at the time of an accident
- Other sources such as:
 - Other Group companies for the purposes of managing operations and/or risks at a group level
 - CCTV systems for the purposes of security, fraud and crime prevention

- Medical practitioners and laboratories (collecting reports from doctors in case of a claim)
- Insurance intermediaries
- Government and law enforcement agencies

4. Why we Process your Personal Data and on what legal basis/es

(a) Legal Basis

The law allows the Company to process Personal Data, including sharing Personal Data outside the Company, only if the Company has a proper reason to do so. Specifically, the Company must have one or more of the following reasons to use your Personal Data:

To fulfil a contract you have with the Company or to take any steps, at your request, prior to entering into a contract with the Company - The Company processes your Personal Data in order to provide you with insurance products/services, in accordance to the contracts concluded with you and/or in the course of your application prior to the conclusion of a contract, and/or to execute your orders.

When it is the Company's legal obligation – The Company processes your Personal Data in order to comply with requirements of the legal and regulatory framework governing its operations, including but not limited to insurance legislation, investment services legislation, company law, tax legislation and related regulations, directives/guidelines issued by the Company's regulators.

When it is in the legitimate interests of the Company or another person with whom the data are shared – The Company may process your Personal Data in case it has a legitimate interest to do so, provided this interest does not unfairly go against what is right and best for you. A legitimate interest is when the Company has a business and/or commercial reason to use your Personal Data. When the Company bases the Processing of your Personal Data on legitimate interest you have the right to object at any time to such Processing, on grounds relating to your particular situation. The Company shall no longer process your Personal Data unless it demonstrates compelling legitimate grounds for the Processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Where Personal Data are processed for the purposes of direct marketing, you have the right to object to such Processing, including profiling to the extent that it is related to such direct marketing, whether with regard to initial or further Processing, at any time and free of charge. Where you object to Processing for direct marketing purposes, the Personal Data shall no longer be processed for such purposes.

When you consent to the use – The Company may base the Processing on your consent if such consent is free, specific, and has been given after you have been clearly informed about the details of the Processing. You have the right to withdraw your consent at any time, but such withdrawal does not affect the legality of the Personal Data processed prior to the withdrawal.

When it is in the public interest or in the exercise of official authority vested in the Company – The Company may process your Personal Data when it is necessary for the public interest by virtue of official authority granted to the Company and provided that the Processing is performed lawfully and fairly, in a clear, precise and transparent manner.

(b) Purposes of Processing

Indicatively, the Company processes your Personal Data for the following purposes under the legal basis marked respectively on the table below.

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<p><u>Provision of services</u></p> <p>We need to process your Personal Data:</p> <ul style="list-style-type: none"> in order for the Company to be able to distribute insurance products e.g., prepare quotations to clients, issue, renew and/or amend contracts and/or view applications. In some cases, for the purposes of issuing the quotation and providing cover to the client, the data is transferred to reinsurers. for the management of third-party claims that have suffered losses from Company's clients. in order to assess and pay claims. Based on the terms of the policy, in case an insured event occurs the Company will need to pay the claims to clients. This involves the assessment of claims (to assess whether payable and pay the right amount). The Company may transfer your Personal Data to third parties for the assessment of claims of the Company's customers e.g. to public authorities (police) for claim assessment, to external lawyers during claim assessment, to medical consultants/ medical centers during claim assessment, to claim assessors. 	X	X	X		
			<p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> to use of insurance intermediaries for the distribution of insurance products. Proposed telephone campaigns towards contacting customers with existing insurances to promote other insurances to them (e.g., with extra benefits). transferring of Personal Data to a third party e.g., public authorities (police), external lawyers, medical consultants/ medical centers, claim assessors. 		

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<ul style="list-style-type: none"> for the purposes for providing Accident Care Services, Road Assistance Services, Pre-insurance vehicle checks. 					
<p><u>Audit / Investigations</u></p> <p>The Company may process your Personal Data during audits / investigations carried out either by internal auditors and other control functions or by external auditors and/or regulators on the Company's operations.</p>		X	Legitimate interest pursued: <ul style="list-style-type: none"> To be able to enhance the Company's controls and to outsource the internal audit function and/or other departments and functions for monitoring and audit purposes or where external expertise is required. 		
<p><u>Reporting to regulatory and other authorities and public bodies</u></p> <p>We need to process your Personal Data in order to report ad hoc where deemed necessary various information to regulators which sometimes includes client Personal Data.</p>		X			
<p><u>Manage risks</u></p> <p>In our operations we are called to manage various risks and ensure that our clients, counterparties, stakeholders and the Company are properly safeguarded against those risks. For the purposes of managing those risks we may need to process your Personal Data (e.g., observation of CCTV systems for the purposes of security, fraud and crime prevention, collection of unpaid premiums / overdue debts). Indicatively the risks managed include:</p> <ul style="list-style-type: none"> Physical access to our buildings Crime and fraud 	X		Legitimate interest pursued: <ul style="list-style-type: none"> To monitor the access to the Company's premises and other locations to ensure security of staff, customers, visitors and assets. To assess incidents or threats of crime in the Company's premises or on the Company's assets or people. 		

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<ul style="list-style-type: none"> • Cyber & Information security • Operational risks • Financial risks • Breaches and other incidents • Regulatory risks • Legal risks 			<ul style="list-style-type: none"> • To manage arrears either by the Company or through third-party service providers • To obtain advice from external lawyers e.g., for handling complaints and/or complaints from regulators etc 		
<p><u>Preparation of Financial Statements/ Manage costs and income</u></p> <p>We may process your Personal Data during the preparation of our financial statements, during assessment, management and reporting of costs and income, during setting up the models for the parameters of provisions (including at Group level).</p>	X	X	<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> • To facilitate the financial affairs of the Company 		
<p><u>Internal Operations</u></p> <p>The Company may process your Personal Data during administrative internal operations such as:</p> <ul style="list-style-type: none"> • Maintaining register of contact details and contracts with third parties for the payment of invoices, maintaining registry of all agreements with insurance intermediaries • Recording of telephone communications aiming to improve Company's services, communication with clients, securing payments made over the phone and securing the interests of the Company. <p>Additionally, the Company may share your personal data with third parties as listed in section 5 of this Privacy Notice for the internal operation purposes listed below:</p>	X		<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> • maintenance of registers for administrative purposes e.g., for payment of invoices • To record calls for better service/improvement of services <p>When sharing your personal data with third parties or when receiving your personal data from third parties, the Legitimate Interests pursued are listed under the column "Purposes of Processing"</p>	X (for recordings)	

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<ul style="list-style-type: none"> for claim assessment and for collection of premiums – to external legal advisors for claim assessment – to public authorities e.g., police for claim assessment – to medical consultants/ medical centers to enable the Company to manage its correspondence needs – to couriers 					
<p><u>Administration of Company system /engine</u></p> <p>The Company may process your Personal Data to ensure the smooth operation of the systems utilised in its operations i.e., to administer user access rights, for troubleshooting, configuration, implementation and maintenance / development.</p>		X	<p style="text-align: center;">X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> To be able to administer the Company's systems in order to ensure their smooth and accurate operation/ administration To provide access to Company's systems where necessary in order for members of staff to be able to perform their tasks/duties To access data in systems in order to identify system glitches To provide access to third party service providers in order to support the IT Department with the heavy workload and for the implementation of 		

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
			new modules/features in various systems		
<p><u>Management of complaints</u></p> <p>The Company may process your Personal Data when a complaint is submitted for the purposes of responding and/or handling that complaint. This includes management / handling of complaints by the Company and transfer of Personal Data relating to complaints to the Bank for Group reporting purposes.</p>	X	X	<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> To process any Personal Data provided by you and/or held by and/or given to the Company in order to respond to and/or handle the complaint received and send it to the Bank for Group reporting purposes 		
<p><u>Communication</u></p> <p>The Company may process your Personal Data for the purposes of communicating with you indicatively for the following reasons:</p> <ul style="list-style-type: none"> to provide general information on Company issues i.e., closing of branches, working hours etc. to provide specific information for a specific product/service you hold e.g., about your insurance policies for marketing purposes (i.e., direct marketing via mail/post and live calls with human intervention, direct marketing via electronic means without human intervention) to inform you of the results of campaigns/competitions/ draws to which you participated to inform you of cases of fraud and or breaches 	X		<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> To communicate with clients in relation to general information on Company issues, or specific information for a product/service of the customer, or for general campaigns to inform clients about similar products/services of the Company 	X	

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<p>The Company may also communicate with natural persons who are not clients of the Company:</p> <ul style="list-style-type: none"> whose Personal Data were obtained in conferences/ exhibitions etc in order to promote Company's products and services for direct marketing (even if the Personal Data/contact details are available to sources open to the public) 					
<p><u>Competitions/ Promotions</u></p> <p>The Company or an external third party appointed by the Company may carry out promotional and rewarding competitions on social media. Your Personal Data may be processed by the Company for the purposes of the competitions in accordance with the terms disclosed from time to time in relation to the specific competition, provided that you decide to participate.</p> <p>The Company may also process your Personal Data during competitions/campaigns if you are an existing client of the Company using its products/services to reward you for your commitment and preference to the Company's products. The campaigns may be executed via any of your contact details provided to the Company i.e., via SMS, email, mail, call.</p> <p>The Company may also transfer your Personal Data to the Bank in order for the Bank to conduct campaigns to promote banking and insurance products.</p>			<p style="text-align: center;">X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> For participation in social media competition To promote the usage of the Company's products and reward clients through the opportunity to win gifts and benefits 		

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
Where needed a separate specific Privacy Notice will be provided to you.					
<u>Record keeping /scanning /filing/ archiving purposes</u> The Company needs to keep record of its activities as required by the regulatory framework and/or to defend its legal rights and interests pursued. Your Personal Data will be maintained under this record keeping obligation. You may refer to the specific paragraph in this Privacy Notice with regards to the record keeping provisions. For this the Company may outsource record keeping to companies specializing in these services.			X Legitimate interest pursued: <ul style="list-style-type: none"> • Outsourcing for cost saving and expert services 		

(c) Profiling and Automated decision making

“Profiling” means any form of automated Processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Specifically, profiling is a procedure which may involve a series of statistical deductions. It is often used to make predictions about people, using data from various sources to infer something about an individual, based on the qualities of others who appear statistically similar. Profiling may involve three distinct stages:

- Personal Data collection;
- automated analysis to identify correlations;
- applying the correlation to an individual to identify characteristics of present or future behaviour.

The Company does not make decisions solely on the basis of automated Processing. If the Company uses automated procedures in certain cases, it will inform you of this separately to this Privacy Notice, provided that this is prescribed by law.

5. Who receives your Personal Data

(a) Within the Company

Within the Company, access to your Personal Data is given to those officers who require such access to perform the Company's contractual, legal obligations and other internal activities.

(b) Outside the Company

Access to your Personal Data may also be given to **third party service providers and agents engaged by the Company** to enable more efficient and effective execution of its business operations, provided that an appropriate legal basis exists. Except where they act as separate controllers, service providers and agents appointed by the Company are required to follow the Company's instructions in relation to the Processing of Personal Data, provide written assurances that they process the Personal Data in accordance with GDPR and the information shared will be restricted to the minimum necessary for the specified and explicit purposes.

These are mainly organisations from the categories listed below:

- Property Valuers and surveyors
- Debt collection agents/companies
- Visa / Mastercard / JCC / SEPA Direct Debit Scheme, other payment service agents and participating merchants
- Couriers
- IT systems/solutions providers and cloud service providers (such as for implementation and maintenance / development of engines/systems)
- Insurance Companies / Re-insurance agents/ brokers
- Advisory and professional service providers (such as in relation to road assistance and accident care)
- Legal Advisors
- Companies offering marketing services /advertising agencies/ conference organizers
- Record Keeping companies
- Printing companies
- Hellenic Bank in their capacity as tied insurance advisor of the Company and for the purposes of monitoring and audit purposes as necessary and for reporting purposes in connection to complaints received by the Company.
- CCTV system providers
- Medical consultants/medical centers (such as for claim assessment)
- Claim assessors
- Reinsurers
- Other service providers supporting any of the operations of the Company (such as Call Centre Services)

The Company may be required to share your personal information **with regulatory and other authorities and public bodies** in Cyprus and the European Union, either under a legal obligation or on the basis of the Company's legitimate interests:

- The police and MOKAS
- Tax authorities
- Financial Ombudsman
- Commissioner for Personal Data Protection
- The Superintendent of Insurance
- The Insurance Companies Control Service, the European Insurance and Occupational Pensions Authority
- Other regulators, authorities and public bodies insofar as a statutory or official obligation exists

The Company may also provide your Personal Data to companies you ask the Company to share your data with.

The Company may need to share your personal information with other organizations to provide you with the product or service you have chosen:

- If you use a debit, credit or charge card in relation to any payment(s) to the Company for its services offered to you, the Company will share transaction details with companies which help the Company provide the relevant service to you (such as JCC, Visa and Mastercard).

- If you pay your policy by the use of direct debits, the Company will share your data with JCC.
- If you make an insurance claim, information you give to the Company may be put on a register of claims. This will be shared with other insurers and/or reinsurers.
- If you have used your policy with the Company as a collateral for a loan or mortgage, the Company may share information with other lenders who also hold a charge on the property provided that the Company will receive appropriate consent by you.

Additionally, the Company may have a legitimate interest in transmitting your Personal Data **within the Group** for internal administrative purposes and/or a legal obligation to do so i.e. for group regulatory reporting.

6. Transfer of Personal Data to third countries or international organisations

The Company will only transfer your Personal Data to a country outside the EEA (a "third country"):

- If this is required for the execution of your orders (for example, by reinsurance associates of the Company within the context of executing your policy or claim)
- if this is prescribed by law (for example, reporting obligations under tax law)
- in the context of data Processing undertaken by third parties on behalf of the Company and according to the Company's instructions

If the Company does transfer your Personal Data to a third country, the Company will make sure that your Personal Data is protected in the same way as if it was being used in the EEA. The Company will apply one of the following bases:

- Transfer it to a third country with privacy laws that give the same protection as the EEA, as certified by an adequacy decision of the European Commission.
- Transfer it to organisations that comply with binding corporate rules, or an approved code of conduct or certification mechanism that requires its protection to the same standards as applicable in the EEA.
- Put in place a contract with the recipient which includes the standard data protection clauses adopted by the European Commission or adopted by the supervisory authority and approved by the European Commission.
- Where the recipient in the third country has signed up to a code of conduct, which has been approved by a competent supervisory authority. The code of conduct must include appropriate safeguards to protect the rights of individuals whose Personal Data transferred, and which can be directly enforced.
- Where the recipient in the third country has a certification, under a scheme approved by a competent supervisory authority. The certification scheme must include appropriate safeguards to protect the rights of individuals whose Personal Data transferred, and which can be directly enforced.

You may learn more about these on the European Commission website [International dimension of data protection | European Commission \(europa.eu\)](#).

In the case where none of those bases apply, your Personal Data may still be transferred to a third country under the following conditions/ derogations, where:

- you explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers due to the absence of an adequacy decision and appropriate safeguards;
- the transfer is necessary for the performance of a contract between you and the Company, or the implementation of pre-contractual measures taken at your request;
- the transfer is necessary for the conclusion or performance of a contract concluded in your interest between the Company and another natural or legal person;
- the transfer is necessary for the establishment, exercise or defense of legal claims;
- the transfer is necessary in order to protect the vital interests of the Data Subject or of other persons, where the Data Subject is physically or legally incapable of giving consent.

Where a transfer could not be based on any of the above, a transfer to a third country or an international organisation may take place only if:

- the transfer is not repetitive,
- concerns only a limited number of Data Subjects,
- is necessary for the purposes of compelling legitimate interests pursued by the Company which are not overridden by the interests or rights and freedoms of the Data Subject, and
- the Company has assessed all the circumstances surrounding the data transfer and has on the basis of that assessment provided suitable safeguards with regard to the protection of Personal Data.

In such a case the Company shall inform the supervisory authority of the transfer and the relevant persons whose Personal Data will be transferred on the fact of the transfer and the compelling legitimate interests pursued.

6.1 Cloud Services

The Company uses cloud technology to store your Personal Data referred to under section 3 above. The cloud service providers used by the Company and their data centers, are located in the European Union and thus bound by the GDPR requirements.

Despite this, there are cases where Personal Data may be transferred to or accessed from a third country for the purposes of the provision of the services outsourced or, if required by law. In such case the Company shall ensure that the relevant safeguards as mentioned in section 6 above will apply.

The Company ensures contractually that the cloud service provider will apply principles of data minimization and will not use or otherwise process your Personal Data for: (a) user profiling, (b) advertising or similar commercial purposes, or (c) market research aimed at creating new functionalities, services, or products or (d) any other purpose, unless such use or Processing is in accordance with Company's documented instructions.

In case where special categories of Personal Data (Personal Data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation) will be transferred on cloud, the Company will notify the Commissioner for Personal Data Protection prior to such transfer if required by the applicable regulatory framework i.e. when the cloud service provider transfers the special categories of Personal Data to a third country.

Retention of Personal Data on cloud shall be in line with the general retention policy of the Company as described in section 7 below.

You may still exercise your rights as disclosed in section 9 below in relation to this Processing activity.

7. For how long your Personal Data is retained by the Company

(a) Existing relationships

The Company processes and stores your Personal Data as long as you are a customer of the Company and/or you maintain any type of relationship with Company and such Processing is necessary for the performance of the Company's contractual obligations, including the period prior to the conclusion of the contract with you (i.e. pre-contractual arrangements) and other legal obligations.

(b) Terminated relationships

After you stop being a customer of the Company and/or you stop maintaining any type of relationship with the Company, the Company may keep your Personal Data for a period of up to 10 (ten) years from the date of termination for the following reasons:

- To maintain records according to rules that apply to the Company such as under applicable tax, insurance and money laundering laws and regulations
- To respond to any questions or complaints
- To demonstrate if needed that the Company treated you fairly
- To preserve evidence that may be needed for the establishment, exercise or defence of legal claims

It is clarified that if the Company holds your Personal Data because you are related to a customer of the Company (e.g. you are a representative, beneficial owner, officer or a party in the insurance policy), the Company may keep your Personal Data for any of the above reasons for up to 10 years after the end of the relationship of the Company with the relevant customer.

The Company may keep your Personal Data for longer than the said period:

- If we cannot delete it for legal and/or regulatory and/or technical reasons. If we do so, we will ensure that your privacy is protected, and the Personal Data is used only for the purposes stated in section 4 above. For example, by the expiration of the above period, there are on-going judicial proceedings with the Company concerning you directly or indirectly. In such a case the above period for the retention of the Personal Data will be extended until a final judicial decision is issued.
- For research or statistical purposes. If we do so, the Company will make sure that your privacy is protected, and your Personal Data is processed only for research or statistical purposes.

(c) Prospect Customers

In case you provide us with Personal Data for the purposes of becoming a customer of Company but for any reason whatsoever you do not become a customer, we shall keep your personal information for a period of up to 3 (three) months from the date the Company provides a proposal / quotation for insurance.

(d) Other provisions

In all respects, where a shorter or longer time period for the retention of Personal Data is provided for by law or regulatory acts, the retention period mentioned above will be reduced or increased accordingly.

8. Consequences for refusal to provide your Personal Data

Kindly note that if you do not provide us with the Personal Data which is legitimately required, then we will not be allowed / or be able to commence or continue our business relationship with you or another relevant person.

9. Your Rights

Your data protection rights, granted by the GDPR, are described below. You may exercise them at any time in any of the following ways:

- by calling the Company at 22743743,
- through email at pancyprian@hellenicbank.com,
- submitting your request in writing to any office of the Company or any branch of the Bank

(a) Right to access Personal Data

You have the right to obtain from the Company confirmation as to whether or not your Personal Data is being processed and/or obtain access to your Personal Data held by the Company.

(b) Right to rectification of Personal Data

You have the right to question any Personal Data the Company holds about you that you think is wrong or incomplete. If you do, the Company will take reasonable steps to check its accuracy and correct it.

(c) Right to erasure (“right to be forgotten”)

You have the right to have the Company delete or remove your Personal Data in the following circumstances:

- The Processing of the Personal Data by the Company is no longer necessary for any of the reasons the Personal Data was collected and used.
- You have withdrawn your consent and there is no other reason for the Personal Data Processing.
- You have successfully objected to the Processing of the Personal Data by the Company.
- The Personal Data has been unlawfully processed.
- Deletion is required by law.

It is clarified that the Company reserves its right to deny the said erasure, if the Processing is necessary for the Company to comply with its legal obligation, for reasons of public interest and/or for the exercise of its legal claims.

(d) Right to restriction of Processing of your Personal Data

You also have the right to restrict the Company’s use of your Personal Data in the following circumstances:

- pending verification by the Company of Personal Data the accuracy of which you have contested
- the Processing is unlawful, but you do not want your Personal Data to be erased
- the Company no longer needed the Personal Data, but you do not want it to be erased because you need it for the establishment, exercise or defense of legal claims
- pending the Company’s assessment where you have objected to Processing intended to safeguard the Company’s legitimate interests.

(e) Right to data portability

You have the right to receive your Personal Data from the Company in a structured, commonly used and machine-readable form. You can also ask the Company to transfer your Personal Data in this format to other organisations, where this is technically feasible. This right relates to the Personal Data which you have provided to the Company and which the Company processes electronically in reliance on your consent or for fulfilling the contract between you and the Company.

(f) Right to object

You have the right to object to the Company’s use of your Personal Data and ask the Company to stop using your Personal Data in any of the following circumstances:

- You have the right to object, on grounds relating to your particular situation, at any time to Processing of your Personal Data which is intended by the Company to safeguard its legitimate interests or to serve the public interest. If you lodge an objection, the Company will no longer process your Personal Data unless the Company can demonstrate compelling legitimate grounds for the Processing which override your

interests, rights and freedoms or unless the Processing is for the establishment, exercise or defence of legal claims.

- You have the right to object to the Processing of your Personal Data for direct marketing purposes, including profiling. If you lodge such an objection, your Personal Data will no longer be processed for such purposes.
- You have the right to object to the Processing of your Personal Data for scientific or historical research purposes or statistical purposes, on grounds relating to your particular situation, unless the Processing is necessary for the performance of a task carried out for reasons of public interest.

(g) Right to withdraw your consent

Where the Company relies on your consent for the Processing of your Personal Data, you can withdraw your consent at any time. If you withdraw your consent, the Company may not be able to provide certain products or services to you. If this is so, the Company will tell you before giving effect to your withdrawal notification.

Please note that the withdrawal of the consent does not affect the legality of the Personal Data processed prior to the withdrawal.

10. Filing a complaint

If you are unhappy with how the Company processes your Personal Data, you may inform:

The Company

- through email at PIL.Complaints@hellenicbank.com ; or
- by post to General Manager, Pancyprian Insurance Limited, 66 Griva Digeni Avenue, 1095, Nicosia, P.O 21352, 1507, Nicosia

The DPO

- through email at dataprotection@hellenicbank.com

The Office of the Commissioner for Personal Data Protection of the Republic of Cyprus

You can find information regarding the filing of complaints on the relevant website (<http://www.dataprotection.gov.cy>).

11. Changes / Amendments to the Privacy Notice

This Privacy Notice sets out the information that the Company must provide to you for the purposes of the GDPR. Any information in relation to the Processing of Personal Data that is included in any of the Company's existing circulars, manuals and associated forms on matters which are covered by this Privacy Notice are deemed to be superseded by the information in this Privacy Notice.

The Company may revise or update this Privacy Notice from time to time. The new version of this Privacy Notice will be available on the Company's website.

In case of significant changes (such as in relation to the reasons for which the Company uses Personal Data or to the way in which you may exercise the rights described above), the Company will bring these changes to your attention.