



HELLENIC REPUBLIC
CAPITAL MARKET COMMISSION

INFORMATION PROVIDED TO DATA SUBJECTS

(Articles 13 and 14 of the General Data Protection Regulation)

natural persons subject to suitability assessment

- member of the management body of an Investment Firm (AEPEY) (Article 9 of Greek law 4514/2018 Guidelines)
- member of the management body of an Investment Intermediation Firm (AEED) (Article 87(7) of Greek law 4514/2018)
- shareholder with qualifying holding in an Investment Firm (AEPEY) (Article 10-11 of Greek law 4514/2018 and Regulation 2017/1946)
- shareholder with qualifying holding in an Investment Intermediation Firm (AEED) (Article 87 par. 2 -reference article 10 of Greek law 4514/2018 and Decision of HCMC 3/452/1.11.2007)
- tied agents of Investment Firm (AEPEY) -registration in the register of tied agents (Article 29 of Greek law 4514/2018 and Decision 2/808/7-2-2018 of the Board of Directors of the Hellenic Capital Market Commission)
- tied agents of Investment Intermediation Firm (AEED) -registration in the register of tied agents (Article 87 par. 2 reference to Article 29 of Greek law 4514/2018 and Decision 2/808/7-2-2018 of the Board of Directors of the Hellenic Capital Market Commission)
- member of the compensation committee of the Guarantee Fund -Approval of the appointment by the Board of Directors of the Investment Services Insurance Guarantee Fund (Article 68 96) of Greek law 2533/1997)
- special liquidator registration in the register of the HCMC (Article 90(3) of Greek law 4514/2018)
- shareholder without special participation in an Investment Firm (AEPEY) (Part A, paragraph 7.3 of Annex II of Decision 4/461/24.1.2008 of the Board of Directors of the Hellenic Capital Market Commission)

-internal auditor of an Investment Firm (AEPEY) (Part A, paragraph 7.3 of Annex II of the Decision 4/461/24.1.2008 of the Board of Directors of the Hellenic Capital Market Commission)

-Internal auditor of an Investment Intermediation Firm (AEED) (paragraph 6.3 of Annex II of Decision 5/461/24.1.2008 of the Board of Directors of the Hellenic Capital Market Commission)

-Regulatory Compliance Officer of an Investment Firm (AEPEY) (Part A, paragraph 7.3 of Annex II of the Decision 4/461/24.1.2008 of the Board of Directors of the Hellenic Capital Market Commission)

-risk management officer of an Investment Firm (AEPEY) (Part A, paragraph 7.3 of Annex II of the Decision 4/461/24.1.2008 of the Board of Directors of the Hellenic Capital Market Commission)

-head of the Prevention of Money Laundering in an Investment Firm (AEPEY) (Part A, paragraph 7.3 of Annex II of the Decision 4/461/24.1.2008 of the Board of Directors of the Hellenic Capital Market Commission)

-persons of Investment Firms (AEPEY) holding a certificate of professional suitability per investment service or activity and ancillary service, where required (Part B, paragraph 4 of Annex II of the Decision 4/461/24.1.2008 of the Board of Directors of the Hellenic Capital Market Commission)

-branch manager of an Investment Firm's (AEPEY) branch (Articles 1, 6 and 7 of Regulation (EU) 2017/1943 of the European Commission)

-branch manager of an Investment Firm (EPEY) or a tied agent of an Investment Firm (EPEY) (Part 2 of Regulation (EU) 2017/2382 of the European Commission).

-responsible for the protection of the financial instruments and capital of the clients of an Investment Firm (AEPEY) (Article 7 of Decision 1/808/2018 of the Board of Directors of the Hellenic Capital Market Commission)

-natural persons for whom warnings are issued to the investors for unlawful provision of investment services. These warnings may be issued by the Hellenic Capital Market Commission or received from foreign supervisory authorities.

Data Controller

HELLENIC CAPITAL MARKET COMMISSION - LEGAL ENTITY, with registered office in Athens (Kolokotroni 1, Athens 105 62), tel. 210-33.77.100.

The Hellenic Capital Market Commission was established as a legal entity (Greek law 1969/1991) and was organized by Greek law 2324/1995 with its registered office at Kolokotroni 1 & Stadiou, Athens 105 62, aiming to ensure the protection of investors and the orderly operation of the Greek capital market, operates exclusively in the public interest, and

in general processes personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority vested in it as a data controller.

The Hellenic Capital Market Commission, as controller, collects, maintains and processes personal data for specified, explicit and legitimate purposes and such data shall not be further processed in a manner incompatible with those purposes.

The Hellenic Capital Market Commission does not process special categories of personal data.

In particular, according to Articles 9-11, 29, 87 and 90 of Greek law 4514/2018, Regulation (EU) 2017/1943/, 2017/1946, 2017/2382, and the decisions of the Board of Directors of the Hellenic Capital Market Commission 3/452/2007, 4/461/2008, 5/461/2008 1/808/2018 and 2/808/2018 and relevant guidelines, the Hellenic Capital Market Commission as a controller collects, maintains and may process personal data, and personal data relating to criminal prosecutions, security measures, criminal convictions (Article 10 GDPR) and administrative sanctions of the Board of Directors of the Hellenic Capital Market Commission, as well as data relating to the solvency and tax compliance of the assessed natural persons.

This data is collected :

- directly from the persons applying for a suitability assessment and/or
- through supervised entities and/or
- through public authorities and/or
- through other supervisory authorities.

Purpose of processing and categories of personal data

The personal data collected, maintained and processed by the Hellenic Capital Market Commission as a controller in accordance with Articles 9-11, 29, 87 and 90 of Greek law 4514/2018, Regulation (EU) 2017/1943/, 2017/1946, 2017/2382, and the decisions of the Board of Directors of the Hellenic Capital Market Commission 3/452/2007, 4/461/2008, 5/461/2008, 1/808/2018 and 2/808/2018 and relevant guidelines, are used for

- the assessment of suitability,
- keeping a record of the suitability approvals granted,
- the verification of the organizational adequacy of supervised entities.

The personal data are collected and processed lawfully for the achievement of the abovementioned specified, explicit and legitimate purposes.

The personal data subject to the abovementioned processing is data relating to CVs, proof of payment of examination fees, disciplinary proceedings and sanctions for administrative offenses, solvency of the assessed persons, identity and contact details.

In addition, in order to achieve the above purposes, the Hellenic Capital Market Commission collects personal data of applicants relating to criminal prosecutions, security measures and

criminal convictions (Article 10 of the GDPR) on the basis of the applicable legislation. Certificates of non-bankruptcy and tax information of the assessors are also collected.

In case of objection by the applicants to the processing of such data, it is not possible to assess their reliability and suitability.

Legal basis

The legal basis for the processing of the above personal data is the provision of Article 6 par. 1(c) of the GDPR, as the collection and processing constitutes a legal obligation of the controller, as mentioned above.

Recipients

The Hellenic Capital Market Commission collects, maintains and processes personal data that it collects and does not further transmit it to third parties.

This data is not disclosed to other bodies, except to other national and foreign supervisory authorities, upon formal request, in particular in the context of an investigation.

Responsible authorized officers

For personal data issues of natural persons subject to suitability assessment as above, the requests are addressed to the Hellenic Capital Market Commission. The officials responsible for the suitability assessment are the Director of Capital Market Intermediaries Directorate and the Head of Licensing of Investment Firms Department of the Capital Market Intermediaries Directorate of the Hellenic Capital Market Commission.

Data Protection Officer

The HCMC has appointed a Data Protection Officer (DPO).

Contact details of the Data Protection Officer: dpoepke@cmc.gov.gr or by post to the address: KOLOKOTRONI 1 & STADIU, ATHENS 10562 (Attention: Data Protection Officer)

Data retention period

The Hellenic Capital Market Commission keeps the personal data for at least 25 years for archiving purposes in order to perform a task carried out in the public interest and/or in the exercise of an official authority entrusted to the Hellenic Capital Market Commission, as a controller.

Rights of data subjects

With the new General Data Protection Regulation (GDPR) 2016/679 of the European Union, any interested party has the right to submit a request to the Hellenic Capital Market Commission for access and rectification or erasure of personal data or restriction of the processing of data concerning it or the right to object to the processing or the right to withdraw consent.

The abovementioned rights shall be exercised by submitting a written request addressed to the Hellenic Capital Market Commission.

Right of Lodge Complaint

Any interested party has the right to lodge a complaint with the competent supervisory authority, the Hellenic Data Protection Authority.

Hellenic Data Protection Authority (DPA) details:

Offices: Kifissias 1-3, Athens 115 23

tel: +30-210 64.75.600

Website: <https://www.dpa.gr/>

The HCMC is in constant alignment and compliance with the terms of the GDPR and is constantly making every effort to comply with it.

Reviews

Prior to any possible change in the processing of personal data through the Website, this Notice will be amended accordingly and will be posted for the information and effective exercise of the rights of any interested party.