

**NOTICE TO THE CLIENTS OF ONEXCHANGE ON THE PROCESSING OF THEIR PERSONAL DATA PURSUANT TO THE GENERAL DATA PROTECTION REGULATION (EU) 2016/679 AND THE RESPECTIVE GREEK LEGISLATION**

The Company ONEXCHANGE BUREAU DE CHANGE SOCIÉTÉ ANONYME, having its registered seat in Athens, 4 Karageorgi Servias street, ZIP Code 10562 (hereinafter «**ONExchange**»), in its capacity as data controller informs you as its clients, by virtue of the present, pursuant to the General Data Protection Regulation (EU) 2016/679 and the respective provisions of the applicable Greek legislation on the protection of personal data, about the processing of your personal data and your rights for the protection thereof.

**1. What personal data does ONExchange collect and process\*?**

- A. Identification data: first and last name, father's name, mother's name, copy of ID / passport, date of birth, nationality, tax registration number.
- B. Contact data: postal address, e-mail address, landline, mobile phone number.
- C. Data of financial status: profession, declared earnings / declared earnings of spouse, other data indicating a source of income / exchange currency (e.g. purchase documents / foreign currency transactions etc.).
- D. Your image data collected from the closed-circuit television systems at the premises of ONExchange, which bear the special signs as provided for by law.

\*For the clients of wire transfers/remittances and tax refunds only their first and last name, father's name, ID or passport number and contact data is collected.

**2. Where does ONExchange collect your personal data from?**

- A. Your data under (A) to (C) above is collected directly from you, when you execute a transaction or via e-mail or fax. ONExchange may also collect your personal data from freely accessible public social networks (e.g. Facebook, Instagram, Twitter) in order to verify your identity.
- B. The data under (D) above is collected from the recording systems installed at the premises of ONExchange.

**3. For what purposes does ONExchange collect and process your personal data?**

- I. In the context of executing sale purchase transactions with exchange currency, ONExchange collects and processes your personal data under 1 (A) to (C) above for the execution of your orders (the processing is necessary for the performance of a contract to which the data subject is party) and the compliance of ONExchange's legal obligations deriving from the Act of the

Governor of the Bank of Greece no. 2541/27.2.2004 on the establishment and operation of bureaux de change and Law 4557/2018 on the prevention and suppression of money laundering from criminal activities and financing of terrorism, for the following purposes:

- A. The verification of your identity.
- B. The communication with you concerning your transaction if required.
- C. The conduct of a check to determine if you are included in any list of restrictive measures.
- D. Your classification in a risk category for the implementation of the appropriate due diligence measures according to Law 4557/2018.
- E. The certification of your income and the evaluation of your transactional behavior.
- F. The identification and monitoring of your previous transactional activity and the creation of your transactional profile.
- G. The recording of your transactions in ONExchange's information system in order to keep a record of transactions.
- H. Your data under 1 (D) above is collected for the safety of the tangible and intangible property and data of ONExchange, its clients and its employees, the safety of their physical integrity and the exercise of ONExchange's relevant rights. (The processing is necessary for the purposes of the legitimate interests pursued by the data controller as well as the protection of the vital interests of the data subjects or other natural persons).

II. In the context of providing services of wire transfers / remittances and tax refunds through the partners\*\* of ONExchange, the latter collects your personal data under 1 (A) to (C) above for the following purposes:

- A. The execution of your orders (the processing is necessary for the performance of a contract to which the data subject is party).
- B. Your identification (the processing is necessary for the performance of a contract to which the data subject is party).
- C. The communication with you in relation to the execution of your order if required (the processing is necessary for the performance of a contract to which the data subject is party).
- D. To keep a record of the services provided (The processing is necessary for the purposes of the legitimate interests pursued by the data controller).
- E. Your data under 1 (D) above is collected for the safety of the tangible and intangible property and data of ONExchange, its clients and its employees, the safety of their physical

integrity and the exercise of ONExchange's relevant rights. (The processing is necessary for the purposes of the legitimate interests pursued by the data controller as well as the protection of the vital interests of the data subjects or other natural persons).

#### **4. Who has access to your personal data?**

- A. Authorized employees of ONExchange to the extent required for the execution of sale purchase transactions with exchange currency and the provision of wire transfer/remittance and tax refund services (e.g. cashiers, accounting clerks).
- B. The Head of the Regulatory Compliance Department for the monitoring of the clients' transactional activity in the context of his responsibilities for the supervision of ONExchange's compliance with Law 4557/2018.
- C. The Internal Auditor in the context of executing audits of ONExchange's internal procedures.
- D. Supervisory (e.g. the National Bank of Greece), judicial, police authorities upon their request.
- E. The Anti-Money Laundering Authority, in case of detection of suspicious transactions or activities that do not comply with the transactions conducted by you and your transactional profile.
- F. Lawyers, law firms, court bailiffs, notaries, accredited mediators of Law 4640/2019, centers that provide mediation services (e.g. OMED), experts, if required for the exercise of ONExchange's rights and the pursuit of its legitimate interests or if required by law or court orders or regulatory orders of the Hellenic Data Protection Authority or other independent authorities.
- G. Specifically for the provision of wire transfers and tax refund services, the recipients of your personal data are the partners of ONExchange for the provision of the relevant services, which are subject to confidentiality constraints.

#### **5. Transfer of your personal data to third countries**

ONExchange does not transfer your personal data to third countries outside the European Union.

#### **6. How long does ONExchange keep your personal data for?**

Your personal data is kept until the statutory time limit for the general waiver of claims, i.e. for a time period of up to twenty (20) years from your last transaction with ONExchange, unless a shorter or longer period of time is set out by a special provision of law or based on a court order or a recommendation by any competent Authority.

Until the expiration of the above-mentioned time period, if court proceedings with ONExchange or any other company of the ONExchange group that concern you directly or indirectly are in progress, the retention period in each case shall be extended until the issuance of an irrevocable court order.

After the lapse of the above-mentioned time periods, your personal data will be destroyed.

## **7. What rights do you have for the protection of your personal data?**

You have the following rights:

- A. To know which personal data that concerns you is being retained and processed by ONExchange, its source, the purposes of its processing, as well as its retention period (right to access).
- B. To request the rectification and/or supplementation of your personal data, so that it is complete and accurate (right to rectification). You must provide any necessary documents which prove the need for such rectification or supplementation.
- C. To request the restriction of the processing of your personal data (right to restriction).
- D. To refuse and/or object to any additional processing of your personal data (right to object).
- E. To request the erasure of your personal data from ONExchange's records (right to erasure).
- F. To request the transfer of your personal data retained by ONExchange to any other data controller of your choice (right to data portability).

As far as the exercise of your above-mentioned rights is concerned, the following are noted:

- ONExchange may refuse to fulfill your rights to restriction, to objection and to erasure of your personal data if the processing or retention of your personal data is necessary for the compliance of ONExchange with its legal obligations or the exercise or support of its lawful rights.
  - The exercise of your right to data portability does not entail the erasure of your personal data from ONExchange's records, which is subject to the preceding paragraph.
  - The exercise of the above-mentioned rights acts for the future and does not concern the processing of personal data which has already been carried out.
- G. To file a complaint with the Hellenic Data Protection Authority (HDP [www.dpa.gr](http://www.dpa.gr)), if you believe that your rights are being infringed in any way.

### **8. How can you exercise your rights?**

For the exercise of your above-mentioned rights, as well as for any issue concerning the protection of your personal data you may contact in writing the Data Protection Officer of ONExchange at the e-mail address: [kleanthous@onexchange.gr](mailto:kleanthous@onexchange.gr).

ONExchange shall use its best efforts to respond to your request(s) within thirty (30) days from its/their submission. This deadline may be extended by sixty (60) further days, provided that it is necessary, at ONExchange's sole discretion, taking into account the complexity of the request and the number of requests. In case of extension of the deadline ONExchange shall inform you within thirty (30) days.

The above service is provided by ONExchange free of charge. However, if your requests are manifestly unfounded, excessive or repetitive, ONExchange may either charge a reasonable fee, informing you thereof or refuse to respond to your request/s.

### **9. How does ONExchange protect your personal data?**

ONExchange implements all the appropriate organizational and technical measures for the safety of your personal data, the safeguarding of the privacy of its processing, as well as its protection from accidental or illegitimate destruction, leak, alteration, prohibited dissemination or unauthorized access, as well as any other illegitimate form of processing.