

## PERSONAL DATA PROTECTION POLICY

*Of the company under named “SAFE ADVISORS Investment Services Société Anonyme”, trading as “SAFE ADVISORS SA”, with registered office in Marousi, Attica, no. 7 Granikou St., P.C. 151 25 (Tax ID No. 997182453, Athens Tax Office for Sociétés Anonymes, General Commercial Register No. 135237960000), in its capacity as Data Controller, pursuant to Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation)*

The Company **SAFE ADVISORS SA** (hereinafter the “**Company**” or “**SAFE ADVISORS**”) is in full compliance with the General Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (GDPR). Our company considers that confidentiality, transparency and correct information are factors of paramount importance for its operation. In all circumstances we try to ensure that all customers, staff and parties involved in transactions with us are able to rely on the Company’s responsibility and ethics.

This policy is addressed to natural persons that are a party to all kinds of transactions with the Company, such as customers with a permanent cooperation relationship with the Company, the legal representatives thereof, as the case may be, as well as their special or universal successors, representatives of legal entities and any natural person who - in any capacity - is involved in transactions with the Company.

### 1. DATA CONTROLLER

The concept of personal data ‘processing’ by the Company includes any operation or set of operations which is performed on 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.

**SAFE ADVISORS** is a data controller, and in this capacity it determines the purposes and means of personal data processing.

For any matter pertaining to processing and, in general, to the handling of personal data, you can contact the Data Protection Officer (DPO) of the Company at the e-mail address [dpo@safe-gr.com](mailto:dpo@safe-gr.com) or by registered letter to the Company, addressed to the Data Protection Officer.

## 2. DATA WE COLLECT AND PROCESS

**SAFE ADVISORS**, in order to provide its investment services to its customers, collects and processes only data that are absolutely necessary for the above purpose, as follows:

- Identification data, such as full name, father's name, gender, age, identification card or passport number, (physical or electronic) signature sample, date and place of birth, nationality and other demographic data;
- Contact data, such as postal and electronic address, landline and mobile phone number;
- Data concerning financial and wealth situation, such as and without limitation, profession, income, tax assessment note, and other tax related data (e.g. Form E1);
- Data concerning transactional behavior during the provision of investment services;
- Data pertaining to the operation of the customer's contract with the Company and the investment and auxiliary services rendered;
- Data concerning the customer's knowledge and experience in the investment sector, the customer's financial status, risk tolerance level and investment goals, in order to provide investment services.

### **Processing of special categories of personal data**

The Company does not process personal data, such as data related to your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a data subject, or data concerning health or your sex life or sexual orientation, unless: a) you have given explicit consent to this end, b) such data has been disclosed to the Company by you or a third party, a natural person or a legal entity, in order to protect your legitimate interests and/or those of the Company in its capacity as data controller (e.g. notification of a data subject entering guardianship), c) processing is necessary to protect your vital interests or the vital interests of another natural person, d) such data have been manifestly made public by you, e) processing is necessary for the establishment, exercise or defense of both your legal claims and those of the Company, in its capacity as data controller (e.g. lack of legal capacity), f) processing is necessary for reasons of substantial public interest (e.g. investigation of a criminally punishable act under the law for preventing and combatting money laundering and terrorism financing).

In any event, the Company has taken all necessary technical and organizational measures for the safe keeping and processing of your personal data belonging to the aforementioned categories.

## Data concerning minors

Data concerning minors are processed by **SAFE ADVISORS** and its employees subject to the strict condition of the prior consent of their parents or guardians, pursuant to the specific provisions of the applicable legislation at each time. For the purposes hereof, the term 'minor' means any person who is not 18 years old.

### 3. DATA SOURCES

**SAFE ADVISORS** processes personal data that you have submitted or are going to submit to the Company yourselves or through your legal representatives. The personal data you have provided to the Company must be complete, accurate and it is your responsibility to update it promptly in any case of change or whenever the Company deems it necessary in order to maintain your transactional relationship with the Company or where the Company has a respective obligation arising out of legislative and regulatory provisions applicable at each time. In addition, the Company processes data it receives or is disclosed by any third party, natural person or legal entity or public agency and which is necessary either for the purposes of the legitimate interests pursued either by the Company or a third party, or for the performance of tasks carried out in the public interest (e.g. tax and insurance legislation).

In addition, the Company may process personal data collected from publicly available sources (e.g. Land Registries/Cadastre Offices, commercial registers, internet), provided that such data are necessary for the purposes of the processing.

### 4. LEGITIMACY OF DATA PROCESSING

The legitimate grounds for collecting and processing personal data by the Company are, as the case may be:

- i. The **commencement, performance and maintenance of contractual relations, already existing or future ones**, between **SAFE ADVISORS** and its customers for the purposes of providing investment services. Any objection to the provision or the processing of your personal data may result in the failure of commencement or continuation of your cooperation with the Company.
- ii. **Compliance by SAFE ADVISORS with legal and regulatory obligations** arising out of the applicable legislative and regulatory framework pertaining to the Company's business activities. We are legally obligated to use and, sometimes, disclose data to competent public agencies for purposes of reviewing of the identity of data subjects and ensuring transparency and legality of financial transactions.

It is noted that personal data are processed by SAFE ADVISORS and in accordance with the provisions of Law 4557/2018 for the prevention and suppression of money laundering and terrorist financing. In this context, personal data may be transmitted by SAFE ADVISORS to the competent authorities supervising the implementation of these provisions as well as to other public authorities charged with the task of combating money laundering and financing of terrorism. The processing of personal data for the above purpose is considered to be a matter of public interest

- iii. The **safeguarding and protection of legitimate interests** pertaining, without limitation, to: a) the exercise of the legal claims of **SAFE ADVISORS** and its customers before competent judicial authorities or other extra-judicial dispute resolution bodies, b) the prevention of fraud and other criminally punishable offenses, c) the evaluation and optimization of the security procedures and the IT systems of the Company, d) the management of operational and credit risks of the Company, e) the physical security and protection of the Company's personnel and assets, as well as those of third parties (e.g. video surveillance).
- iv. The **consent** – specific, explicit and in writing – of the customers of **SAFE ADVISORS**, provided that processing cannot be justified under any of the aforementioned legitimate grounds.

## 5. DATA RECIPIENTS

Specifically authorized and trained employees (including Related Representatives) of **SAFE ADVISORS** have access to your personal data, in the context of performance of their duties. The Company does not transmit or disclose personal data to third parties, with the exception of natural persons or legal entities who have been assigned, in part or in whole, the processing of your personal data on behalf of the Company and who have undertaken, vis-à-vis the Company, confidentiality obligations either a) in the context of a contractual relationship, whereby the object, the purpose, the duration of processing, the type of personal data being processed and the rights of the Company are determined, or b) in the context of a regulatory confidentiality obligation thereof.

In view of the foregoing, your personal data may be transmitted or disclosed to:

- ❖ Natural persons or legal entities, who have been assigned by **SAFE ADVISORS** at each time the performance of specific works on its behalf, including among others lawyers, law firms, notaries public and court bailiffs, software companies, provided that their duty of professional secrecy and the confidentiality obligation are complied with.

- ❖ Credit institutions, payment institutions and companies providing investment services, with registered offices in Greece or abroad, with which **SAFE ADVISORS** cooperates in order to provide its investment and auxiliary services to its customers (execution of orders in order to conclude transactions over financial instruments traded in regulated markets, clearance and settlement services), as well as depositary services.
- ❖ The Athens Stock Exchange, in its institutional capacity as an approved publication arrangement, pursuant to Law 4514/2018 and Directive 2014/65/EU.
- ❖ The Capital Market Commission and other regulatory, independent, judicial, public authorities, in the context of their competences, tasks and powers arising from the applicable legislative and regulatory framework.

**SAFE ADVISORS** has legally ensured that its data processors meet the conditions and provide sufficient assurances for the implementation of appropriate technical and organizational measures so as to ensure that your rights are protected in the context of the processing of your personal data.

## **6. INTERNATIONAL DATA TRANSFERS**

**SAFE ADVISORS** does not directly transfer your personal data to third countries or international organizations, unless such transfer is mandated under the applicable regulatory or legislative framework. In particular, when it is required by the nature of the service rendered, data may be transferred within the European Economic Area and Switzerland, which provides an adequate level of personal data protection according to the European Commission.

## **7. AUTOMATED DECISION-MAKING AND PROFILING**

**SAFE ADVISORS** does not make decisions based solely on automated personal data processing. It may, though, lawfully make such decisions, including profiling, provided that such processing is necessary for the offer, conclusion or performance of a contract, for the safety and reliability of the investment services offered by the Company, as well as for monitoring and preventing fraud and tax evasion against you or the Company or a third person (e.g. unusual transaction at a code number)

## **8. DATA RETENTION PERIOD**

We process, retain and store the data collected in a safe environment, either in hard or electronic form, for as long as it is necessary in order for us to fulfil our contractual obligations towards you and comply with the provisions of the legislative and regulatory framework applicable at each time.

Where any request for cooperation with **SAFE ADVISORS** is not accepted and no contract is concluded, your data will be retained for one (1) year.

In case of judicial proceedings, personal data relating to you will be retained, in any case, until an irreversible judgment is handed down.

When the processing is based on your consent, your personal data will be retained until such consent is withdrawn. It is clarified that withdrawal of consent does not affect the lawfulness of consent-based processing prior to the withdrawal.

In any event, **SAFE ADVISORS** implements appropriate technical and organizational measures in order to ensure the protection of the data being processed and takes constant care to prevent unauthorized access thereto.

## **9. DATA SECURITY**

**SAFE ADVISORS** has implemented reasonable and appropriate technical and organizational measures in order to protect your personal data, and in particular any sensitive personal data that may be collected, from unlawful or unfair processing, accidental or illegitimate destruction, loss, alteration, unauthorized disclosure, prohibited transfer, access or use, as well as from other unlawful or illegitimate kinds processing. The Company follows international standards and practices in order to achieve, on a constant basis, security of physical and electronic files of persona data, such as and without limitation: physical access restrictions to locations where data are stored, protection measures from natural disasters, physical security of IT systems, data encryption, back-ups, controlled access to the IT data processing systems, as well as measures for the protection, recovery and restoration of IT systems and technological infrastructure in case of emergencies.

However, despite the implementation of reasonable measures for the protection of your personal data, security cannot be fully guaranteed against all risks.

## **10. DATA SUBJECTS' RIGHTS**

In accordance with the Personal Data Protection legislation, you have the following rights:

- **Right of Information**

You have the right to be informed of the collection and use of your personal data.

- **Right of Access**

You have the right to obtain information on whether personal data concerning you are being processed and, where that is the case, you have the right of access to your personal data in a concise, understandable, transparent and easily accessible form, as well as to supplemental information, such as, the purposes of processing, the source and the recipients of the data, the processing period, while you may request to receive a copy of your data being processed.

Satisfaction of this right is without prejudice to the legal obligation of SAFE ADVISORS to prohibit the disclosure of information and information where applicable under Article 27 of Law 4557/2018 in the framework of the prevention, investigation and detection of any money laundering and financing of terrorism.

- **Right to rectification**

You have the right to request the rectification, modification and supplementation of your personal data – without undue delay –, via, among others, a supplementary statement.

- **Right of erasure ('right to be forgotten')**

You have the right to request the erasure of personal data concerning you without undue delay. We are obliged to erase such data, without prejudice to the obligations and legal rights of the Company to retain them for a specific minimum period pursuant to the applicable legislative and regulatory framework at each time.

- **Right to restriction of processing**

You have the right to request the restriction of the processing of your personal data in the following cases: a) the processing thereof is unlawful, b) the accuracy of the personal data is contested, until the data is verified accordingly, c) the purpose of the processing thereof no longer exists, but the data is necessary for the establishment, exercise or defense of legal claims by you, e) you object to the processing and until it is verified that the Company has lawful grounds for such processing.

- **Right to object to processing**

You have the right to object to the processing of personal data concerning you on grounds relating to your particular situation, where processing is necessary for the performance of a task carried out in the public interest or for the legitimate interests pursued by the Company or a third party. The Company shall no longer process your data, unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

- **Right to data portability**

You have the right to receive the personal data that concern you and that you have provided to the Company, in a format that allows you access thereto and the use and processing thereof with commonly used methods, as well as the right to request to transmit those data to another controller, provided that the processing is based on consent and is carried out by automated means. This specific right shall be realized

without prejudice to the legal rights and obligations of the Company to retain data and actions carried out in the public interest.

- **Right to withdraw consent**

Where the processing of your personal data is based on your consent, you have the right to withdraw it at any time, without affecting the legitimacy of consent-based processing prior to such withdrawal. The withdrawal shall be effective as of the date the request is submitted. The relevant request must be submitted only in writing, by means of a registered letter to the Company, to the attention of the Data Protection Officer.

## **11. METHOD FOR EXERCISING YOUR RIGHTS**

**Safe Advisors** respects the rights you enjoy with respect to your personal data and facilitates the exercise thereof. You can address any request or question concerning your personal data by means of a registered letter to the Company, addressed to the Data Protection Officer, Ms. Konstantina Karlou or via e-mail at [dpo@safe-gr.com](mailto:dpo@safe-gr.com). We will respond to your request within thirty (30) days from the receipt of the request/question. If an extension to the above deadline is required in order to investigate and/or handle the issue that concerns you, we will notify you of the reasons.

In any event, if you consider that the protection of your personal data has been breached in any manner, you are entitled to submit a complaint to the Hellenic Data Protection Authority (website: [www.dpa.gr](http://www.dpa.gr)) concerning matters pertaining to matters concerning processing of your personal data.

## **12. AMENDMENTS TO THE DATA PROTECTION POLICY**

This Policy may be amended in accordance with the applicable legislation or in order to implement best practices. **SAFE ADVISORS** will announce every amendment to its Policy in order to ensure that you are informed accordingly. Any access or use of our Services after an updated version of this Policy has been posted, indicates your agreement with its contents. The most recent Personal Data Protection Policy will always be available at the Company website [www.safe-gr.com](http://www.safe-gr.com), while you can obtain a hard copy from the Customer Service Department of the Company or it can be sent to you after contacting the Customer Service department or your Investment Advisor.