



NOTICE ON THE PROCESSING OF PERSONAL DATA OF THE COMPANY'S SUPPLIERS-PARTNERS

A. NOTICE TO THE DATA SUBJECT *

ALPHA ASSET MANAGEMENT SINGLE MEMBER MUTUAL FUNDS MANAGEMENT COMPANY S.A., with the distinctive title Alpha Asset Management M.F.M.C. (hereinafter referred to as "the Company"), in its capacity as data controller, informs you, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), Law 4624 /2019 and other provisions on the protection of personal data, that under its instructions and on its behalf, it and/or third parties, process your personal data, as its suppliers, as described below.

I. Which data we collect:

- a) Your **identification** data, such as name, surname, father's name, the name of a sole proprietorship, ID or passport number, Tax Identification Number, and tax office.
- b) Your **contact** details, such as postal and e-mail address, landline and mobile phone numbers, etc.
- c) **Bank account** details.
- d) Details of the **invoice/service invoice** and the reason for its issue.

II. Where we collect your data from:

Your data, under **I (a) to (d)** above, are collected either:

- Directly by you physically or electronically
- From third parties appointed by you
- From publicly available sources
- From the Company's records/systems
- From affiliated companies

Data relating to legal representatives of legal entities are also collected by the G.E.M.I. (General Commercial Register).

III. Why we collect your data and how we process it:

* This information concerns only Individuals

The above data are collected for the following purposes:

- a) the data under **I (a) and (b)** above are collected in order to identify you, to communicate with you, to explore the possibility of cooperation, and to conclude the relevant supply contract(s). (The processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject, prior to entering into a contract (Article 6 (1b) GDPR), as well as for compliance with a legal obligation to which the controller is subject (e.g., Law 4557/2018 as in force) (Article 6 (1c) GDPR)).
- b) the data under **I (c) and (d)** above are collected for the fulfillment of the Company's obligations arising from the relevant supply contract, the payment to you, of the price of the invoices/service invoices issued by you, as well as the Company's compliance with its statutory accounting and tax obligations. (The processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering into contract (Article 6 (1b) GDPR), for compliance with a legal obligation to which the controller is subject (e.g. Law 4557/2018 as in force) (Article 6 (1c) GDPR) and for the purposes of the legitimate interests pursued by the controller (Article 6 (1f) GDPR)).
- c) the data under **I (a) - (d)** above are also collected for the establishment, exercise, or support of a legitimate interest or the legal rights of the Company. (The processing is necessary for the purposes of the legitimate interests pursued by the controller (Article 6 (1f) GDPR)), as well as for the verification of the legality of transactions under the supply contract (e.g., under Law 4557/2018 as in force) - (Article 6 (1c) GDPR)).

IV. Who are the recipients of the personal data:

- a) The authorized employees of the Company responsible for the management and operation of the

Company's procurement contract(s), the management of the relevant orders and the implementation of the Company's obligations arising therefrom, the payment of the relevant invoices/service invoices, and the accounting management thereof.

- b) Individuals and legal entities to whom the Company entrusts the performance of specific tasks on its behalf, such as inter alia,
- database management companies,
 - storage and records management companies,
 - providers of accounting and postal services, development services, maintenance services, and configuration of IT applications,
 - providers of email services, internet hosting services, including cloud services,
 - physical security service providers,
 - cybersecurity and information security service providers,
 - business consultants,
 - assessment and/or certification bodies,
 - lawyers and law firms, notaries, bailiffs, experts, chartered accountants or audit firms.
- c) **Credit institutions and/or domestic or foreign payment service providers**, for the payment of the price of the invoices/service invoices, if applicable.
- d) **Tax authorities** and any other public body, including judicial authorities.
- e) Companies within the Group or affiliated companies of the Company, to the extent necessary for administrative support, regulatory compliance, internal audit and legal support.

V. Are the data transferred to countries outside the EU (third countries) or to an international organization?

The Company may transfer your personal data to countries outside the EU (third countries) if one or more of the following conditions apply:

- a) the European Commission has issued an act on the adequate protection of personal data in the country or international organization in question,
- b) appropriate safeguards have been provided for the processing of personal data in accordance with the law,
- c) if standard contractual clauses have been signed,
- d) the Supplier-Partner has been specifically informed and has given his/her explicit consent to the Company while the other conditions of the legal framework are fulfilled,
- e) the transmission is necessary for the performance of a contract, such as where the transmission is necessary for the execution of payment orders to a bank account of a third country credit institution, or in the case of a transmission for the execution of an order to conclude a transaction in financial media,
- f) the transmission is necessary for the establishment, exercise, or maintenance of legal claims or the defense of the Company's rights,
- g) there is an obligation to do so under a provision of law or an intergovernmental or international agreement; or
- h) in the context of the Company's compliance with the rules of automatic exchange of information in the tax area, as derived from the regulatory and statutory framework (e.g., FATCA, CRS).

In order to fulfill the obligations **under e or f above**, the Company may transfer your personal data to competent national authorities so as to be forwarded through them to the respective authorities of third countries.

VI. For how long the data will be retained:

Depending on your cooperation with the Company, your data will be retained for a period of up to:

- twenty (20) years from the expiry of your supply contract with the Company, i.e., until the expiry of the general statutory limitation period for merchants' claims, unless a shorter or longer period is specified by a specific provision of law or on the grounds of a decision or recommendation of a competent authority.

- five (5) years from the collection of data for Suppliers-Partners with whom the Company has not entered into a cooperation agreement.

If, until the expiry of the above period of time, legal actions are in progress with the Company or any of its group companies that directly or indirectly concern you, the retention period shall be extended until the issuance of an irrevocable court decision.

After the aforementioned periods, your personal data will be erased.

VII. Suppliers'-Partners' Rights to protect their data.

The Supplier-Partner has the following rights:

- To know which personal data concerning him/her are held and processed by the Company, as well as its source (right of access).
- To request the rectification and/or supplementation of such personal data in order to make them complete and accurate, by submitting any necessary document following the need for completion or correction (right of correction), which is also an obligation of the data subject.
- Request the restriction of the processing of his/her personal data (right of restriction).
- To refuse and/or object to any further processing of his/her personal data kept by the Company (right to object).
- To request the erasure of his/her personal data from the Company's records (right to erasure).
- To request the Company to transfer the personal data he/she has provided to the Company to any other controller (right to data portability).

In any case, the Company has the right to refuse the request for the deletion of the Supplier's-Partner's data or for no further processing of the Supplier's-Partner's data (**see above under c, d, and e**) if the processing of the data is necessary for the operation of the supply contract, as well as for the establishment, exercise or support of its legitimate interest, its legal rights or its compliance with its legal obligations in accordance with the provisions of III above.

The exercise of the right to portability (**under f**) above does not imply the erasure of the data from the Company's

records, which is subject to the conditions set out in the immediately preceding paragraph.

The exercise of the above rights shall be effective for the future and shall not relate to data processing already carried out.

The Supplier-Partner has the right to submit a complaint to the Hellenic Data Protection Authority (www.dpa.gr), which is the competent supervisory authority for the protection of the fundamental rights and freedoms of individuals, with regard to the processing concerning him/her, if he/she considers that his/her rights are infringed in any way.

VIII. How the rights referred to in paragraph VI above are exercised.

In order to exercise the above rights under VI, the Supplier-Partner may contact the Company:

- In writing, at the following postal address:
ALPHA ASSET MANAGEMENT M.F.M.C.
Stadiou 40, Athens, 105 64
- Via email, to the following address:
info@alphaasset.gr

IX. How the Supplier's rights are protected.

The Company implements an information security management system to ensure the confidentiality and security of the processing of Suppliers'-Partners' data and to protect them from an accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, as well as from any other form of unlawful processing.

B. CONTACT DETAILS

I. CONTROLLER:

ALPHA ASSET MANAGEMENT M.F.M.C.
ADDRESS: 40, Stadiou street, 105 64, Athens
CONTACT TELEPHONE: +30 210 3266505
EMAIL: info@alphasset.gr

II. DATA PROTECTION OFFICER:

ALPHA BANK
GROUP DATA PROTECTION OFFICER
ADDRESS: 105, Athinon Avenue, Athens, 104 47
Email: contact-DPO@alpha.gr