

# PRIVACY POLICY AND PERSONAL DATA PROTECTION

Hellenic Asset Management (hereinafter "the Firm") is committed to the protection and respect of your privacy and abides with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016) which enters into force in EU member states on 25 May 2018.

This Privacy and Personal Data Protection Policy sets out the categories of personal data stored by Hellenic Asset Management, the way it collects, uses, manages and protects your personal data, as well as your rights as subjects of the personal data.

## **Personal Data collected by Hellenic Asset Management**

Hellenic Asset Management operates, maintains and processes the personal data of its clients only further to their consent and for the execution of the agreements with its clients for the provision of investment and ancillary services, as well as for compliance with its legal obligations towards its supervisory Authorities. The Firm collects the Clients' data only to the extent necessary to achieve the objective set out above.

By completing the information required for the opening of an account with Hellenic Asset Management, the Firm collects personal data (name, surname, address, date of birth etc.) as well as documents containing information that helps us verify the Clients' identity (passport or identity card). In addition, the Firm collects utility bills that can verify the Clients' address, as well as information on the Clients' business activity, income, financial assets, knowledge and experience on financial products, investment goals etc. in order to determine the investment profile.

## **Information processed by Hellenic Asset Management**

Hellenic Asset Management uses and processes Client information only with their consent or when it has another legal reason for their use, such as in the following cases:

- When it is considered necessary for the execution of a contract,
- When it is necessary for compliance with a legal obligation,
- When it is necessary for the pursue of its legitimate interests
- If we consider that the use of the data is in the public interest, for example for the prevention of criminal acts including fraud and financial crimes e.g. financing of terrorism and money laundering.

The transfer by Hellenic Asset Management of Client personal data to third parties is possible only in case:

- It is required for the execution of the agreement with the Client, or
- It is required by law, judicial decision, regulation or Public Prosecutor's order, or
- Upon the Client's request.

In the event that the Firm uses third party service providers, suppliers or business collaborators in the provision of its services to the Client, it takes all reasonable measures to ensure that the third party processes and stores Clients' personal data in a lawful and fair manner.

### **Anti-money-laundering and counter-terrorist-financing screening**

As an obliged entity under Greek Law 4557/2018 and Directive (EU) 2015/849, the Company screens its clients, their beneficial owners and their representatives, at the start of the business relationship and periodically during it, against sanctions and politically exposed persons lists, and performs adverse-media checks against publicly available sources (news sources and internet search services). These checks are carried out in fulfilment of the Company's legal obligation, in accordance with Article 6(1)(c) of the General Data Protection Regulation, using the minimum identification data necessary (name, country and, for natural persons, year of birth). The checks are performed through specialised data and search providers established in the European Union, as well as through publicly available news sources. Results are reviewed by the Company's Compliance Officer and no decision is taken by solely automated means. The related records are retained for five years after the end of the business relationship, unless a longer period is required by law. For more information or to exercise your rights, you may contact the Company's Data Protection Officer.

### **Duration of the safekeeping of the personal data**

The personal data collected by the Firm are stored for a minimum period of 5 years, as provided by the applicable legal framework for the provision of financial services and, in any case, shall not be kept for longer than necessary.

### **Data Security**

The process of the Clients' personal data is carried out in a way that ensures its confidentiality. Hellenic Asset Management uses all appropriate organizational and technical measures for the security and protection of the personal data against unauthorized or unlawful processing, as well as from accidental loss, destruction or damage, illegal dissemination or access and from any other kind of unlawful processing. The security measures are reviewed and amended every time it is deemed appropriate. The process of your data is allowed only to persons authorized by us, to employees and colleagues and solely for the abovementioned purposes. For the protection of the data exchanged with its clients, the Firm uses data encryption technology, in particular SSL (Secure Socket Layer). This type of technology encodes your files and information during the electronic communication, so as not to be intercepted by third parties. In addition to the SSL technology, Hellenic Asset Management uses other systems of electronic security such as firewalls and user authentication methods (passwords, usernames, etc.)

### **Rights of the subjects of the data**

Hellenic Asset Management ensures to the extent possible that the data it stores are updated and accurate and limited to the necessary for the purposes for which they are collected. As subject of the data, you are entitled to exercise any right provided by the applicable legislation on personal data protection. Indicatively, you may request a copy of your personal data, and exercise your right to amend, delete or object to the process of your personal data. In case you consider that the

protection of your personal data is undermined in any way, you may refer to the Personal Data Protection Authority ([www.dpa.gr](http://www.dpa.gr))

For any questions concerning our Terms of Use, our Personal Data Protection Policy, or the way we process your personal data or for any other queries, please do not hesitate to contact us.

Last updated: July 2026