



## Personal Data Protection Policy

In Alpha Asset Management M.F.M.C. (hereinafter “the Company”) we recognize the importance of the personal data (hereinafter “the Data”) of our website’s visitors. The protection of your personal data, always in compliance with the applicable regulatory framework on the protection of personal data, constitutes a commitment for us.

This Personal Data Protection Policy applies to the Company’s website. It aims to provide information regarding the collection, storing, use and any other form of processing of visitors’ data by the Company, in its capacity as Data Controller, as well as regarding your rights pursuant to applicable provisions.

### 1. WHICH ARE THE CATEGORIES OF DATA WE COLLECT FROM YOU

1.1. Data required for the submission of online comments through the Company’s website, complaints, questions and requests.

- Full name, email address, landline and/or cellphone number, comments, requests, etc.;

1.2. Cookies

As it is described in detail in the [Cookies Policy](#), we collect information using cookies.

1.3. Device Data

When you visit our website, we receive the URL address of the website you accessed prior visiting our site, the date and time of your visit, the operation system of the device and the browser used, as well as the IP address of your device.

### 2. INFORMATION WE MAY COLLECT FROM OTHER SOURCES

We collect information that you disclose to us when you visit and/or browse our website, when you submit an online comment, complaint, question or request. Furthermore, we may collect information from third parties (persons or legal entities), e.g. IT and technology companies and social network platforms.

### 3. WHY WE USE YOUR INFORMATION

The Company collects and processes only the data required to pursue the following purposes. In particular:

3.1. We may process your data in the context of the contractual relationship between us:

- For the management of your complaint, in relation to one of our products or services;
- For the management of a request you submit regarding one of our products or services;
- For your information regarding our products and services, for which you have previously expressed an interest;

3.2. We may process your data in order to pursue our legitimate interests, provided that they do not exceed the rights and freedoms of the visitors of our website, e.g.:

- For the accurate and more efficient operation and management of our website;
- In order to investigate and resolve technical issues in the context of the provision of our services (e.g. coding errors);
- For security purposes or to investigate possible fraud or other violations of the terms of use of our website or this policy;



In any case, the Company may process your data for purposes of compliance with the obligations imposed by the currently applicable legal and regulatory framework and the supervising authorities, as well as with the decisions of competent Authorities or Courts.

#### **4. WHO WE WILL SHARE YOUR INFORMATION WITH**

We may disclose your data, in addition to the Employees of the Company responsible for the processing of requests, the management of comments, complaints and questions you submit through our website, provided that the currently applicable statutory conditions are met, to the competent employees of companies of our Group in the context of their activities, as well as to third parties (natural persons and legal entities, to whom the Company assigns from time to time the performance of certain tasks on its behalf), under the condition to maintain at all-time professional secrecy and the confidentiality, e.g.:

- advertising and marketing agencies for the products and services of the Company;
- database and website administration companies;
- providers of innovative solutions for payment technologies and services, providers of postal services, development services, maintenance, customization of IT solutions, email services, hosting as well as cloud services;

In any case, the Company guarantees that it will not transfer, disclose, provide, etc. your data to third parties for any purpose or use, other than those expressly disclosed in this Policy. However, we reserve the right to disclose information related to you, if we are obligated by the law or if said disclosure is required by the competent supervisory, audit, independent, judicial, public and/or other authorities. Furthermore, keep in mind that the Company may transfer the data it collects from its website to countries outside the European Union or to an international organization in the following cases: a) if the European Commission has issued an act regarding the sufficient protection of personal data in that specific country or international organization, b) if you have been specifically informed and you have expressly given your consent to the Company and the other conditions of the legal framework are met, c) if the transfer is necessary for the performance of a contract, e.g. if the transfer is necessary for the execution of orders concerning the Alpha (LUX) Global Funds, d) if the transmission is necessary for the establishment, exercise or defense of legal claims or the defense of the Company's rights, e) if there is a relative obligation arising from a statutory provision or a transnational/ international convention.

#### **5. HOW WE KEEP YOUR INFORMATION SECURE**

The Company implements appropriate technical and organizational measures to ensure confidentiality, integrity and availability of the information on a permanent basis, in order to be protected from incidental or unlawful destruction, loss, alteration, prohibited dissemination or access and any other form of unlawful processing.

The Company audits, pursuant to the established procedures, the compliance with the Group's Information Security Framework, conducts specialized security audits (penetration tests and vulnerability assessments), trains and educates its Personnel on security matters and continuously assesses the elevated information security level, taking, further measures to address new threats and the associated risks, as this deems appropriate.

These measures contain but are not limited to, specialized, multilevel, security mechanisms for the protection of the services provided via Internet and the entire infrastructure of the Company, mechanisms for the prevention of data loss (DLP), recording of access, protection of systems, central management of user access control based on their operational duties, as well as encryption and pseudonymisation of information, when required.

However, it is your responsibility to ensure that the equipment (e.g. personal computer), software, telecommunication equipment that you use is sufficiently secure and protected from malware (e.g. viruses). You should be aware that, by not using sufficient security measures (e.g. secure settings in your browser, updated malware protection software, avoidance of use of software and hardware of dubious provenance, etc.), entails the risk that the data, as well as the passwords you use, can be disclosed to non-authorized third parties.



## 6. HOW LONG DO WE KEEP YOUR DATA

6.1. We will keep your data as long as you are a Customer of the Company and for a period of at least five (5) years after the liquidation of the mutual fund.

6.2. If you are not a Customer of the Company, we may keep the data collected from our websites for a period of up to five (5) years after their collection thereof.

6.3. We will keep your device data for two (2) years after their collection.

6.4. Regarding the retention period of the Cookies, please advise the [Cookies Policy](#).

6.5. After the elapse of the retention period, the Bank will ensure the secure destruction and/or deletion of your data.

## 7. YOUR RIGHTS

You have the following rights regarding the data we keep for you:

- Right of access: You may request to receive information regarding the processing of your data (e.g. the categories of data, the purposes of processing, etc.).
- Right to rectification: You may request us to rectify or supplement your data, if they are incomplete or contain inaccuracies.
- Right to erasure: In some cases, you may request the erasure of all or part of your data (e.g. if the data is no longer required for the purposes for which it was collected).
- Right to restrict processing: You may request the restriction of the processing of your data, where specified by law.
- Right to object: You may object, at any time, to the processing of your data performed, in the context of the pursuance of our legitimate interests, as specified above.
- Right to data portability: You may request us to give you or transfer to a third provider some of the information you have provided us, in electronic form.

## 8. HOW CAN YOU EXERCISE YOUR RIGHTS

If you wish to exercise one of the aforementioned rights, you may contact us:

- in one of the Branches of Alpha Bank, by filing in the [relevant request form](#);
- by sending an email to [SpecializedCustomerServicesUnit@alpha.gr](mailto:SpecializedCustomerServicesUnit@alpha.gr);
- at the address "Alpha Asset Management M.F.M.C., 25-29 Karneadou St, 106 75 Athens;

In case of submission of a request to exercise your rights, the Company shall respond to your relevant request within one (1) month. Said time limit may be extended by two (2) months, following your prior notification, taking into consideration the complexity of the request and the number or requests being processed.

Keep in mind that our response to your aforementioned request is provided free of charge. However, if your requests are obviously inadmissible, excessive or repeated, we may charge a reasonable fee, after notifying you in advance or refuse to respond to your request.

If you believe that your rights are infringed in any manner whatsoever, you may also submit a complaint to the competent Supervising Authority:

### **Hellenic Data Protection Authority**

Address: 1-3 Kifisias Ave., 115 23, Athens

Call Center: +30-210 647 5600

Fax: +30-210 647 5628

Email: [contact@dpa.gr](mailto:contact@dpa.gr)

## 9. MORE DETAILS YOU NEED TO KNOW

9.1. The Company does not collect or gains access to, in any manner whatsoever, special ("sensitive") categories of personal data. The visitor has the obligation to refrain from providing such data, related to its person or third parties. Otherwise the data will be deleted as soon as we become aware of it. The Company shall not be held liable by any visitors or



third parties for the provision and/or processing of such data, caused by their acts or omissions in breach of the aforementioned obligation.

9.2. Our website may contain links to other websites that are not controlled by the Company but by other third parties (e.g. Greek and European Supervising Authorities, other services, etc.).

This Policy does not apply to said websites and we recommend visiting them directly in order to be informed about their data protection policies.

9.3. We may amend this Policy from time to time, in order to be always compliant with the statutory requirements and the procedures of our business activities. If we decide to replace this Policy or effect very important changes, we will notify you with a notice in this website. In order to be informed about the most up to date version of this Policy, visit this page regularly.

## **10. HOW CAN YOU CONTACT US**

If you have questions or complaints related to this Policy you may contact us using the following information:

### **DATA CONTROLLER:**

ALPHA ASSET MANAGEMENT M.F.M.C.  
Address: 25-29 Karneadou St., 106 75 Athens  
Contact number: +30 210 374 2800

### **DATA PROTECTION OFFICER:**

DATA PROTECTION OFFICER OF ALPHA BANK GROUP  
On behalf of ALPHA ASSET MANAGEMENT M.F.M.C.  
Address: 43 Panepistimiou St., 105 64 Athens  
Contact number: +30 210 326 6953  
Email: [contact-DPO@alpha.gr](mailto:contact-DPO@alpha.gr)