

INFORMATION ON THE PROCESSING OF CONSULTANTS' PERSONAL DATA

Pursuant to article 13 of the EU General Data Protection Regulation 679/2016 (hereinafter, the "GDPR") and the respective provisions of the Greek Law 4624/2019 issued in implementation of the GDPR, with reference to your **Personal Data**¹ (The Personal Data you provide to the Company or those provided on your behalf), Nexi Greece Processing Services Single Member S.A., as Data Controller, provides you with the following information.

Details of Nexi Greece

Nexi Greece Processing Services Single Member S.A. (hereinafter, "**Nexi Greece**" or "**the Company**"), is a company established and operating under the laws of Greece, registered in the General Commercial Registry (GEMI), with No 6276801000 and registered seat in the Municipality of Dionysos, at 23rd km National Road Athens Lamia, Agios Stefanos, P.C.14565 Attica, Greece. It is owned and controlled by Nexi S.p.A., with registered seat in Corso Sempione 55, 20149, Milan (Italy).

The Controller can be contacted at the following email address: privacy.gr@nexigroup.com

Source of Personal Data

Nexi Greece collects and further processes the personal data referenced herein, directly from the Consultant or any person (natural or legal), acting on Consultant's behalf, for the provision of consultancy services to the Company (hereinafter, "Consultancy services").

It is noted, that in case you, as Consultant, provide Nexi Greece with third parties' personal data, including those of administrators, representatives, partners, contact persons and management bodies, process agents as well as any staff who has physical or logical access to Nexi Greece premises and systems, you must have ensured that **you have duly informed** such third parties with regard to the transfer of their personal data and the processing thereof by Nexi Greece, and that you have obtained their consent, where necessary.

Categories of Personal Data processed by Nexi Greece

Personal Data which may be processed, fall under the below categories:

- i. Identification Data: Name, Surname, Family name
- ii. Identity Card Data, such as ID/Passport,

¹ **Personal data:** any information concerning an identified or identifiable physical person (data subject). Personal data can be divided into:

- A) **Common Personal Data** - any information which identifies a data subject, and which does not fall under the categories listed in points B and C. These are common personal data, for example: Contact details (first name, surname, address, telephone number, e-mail, etc.), data relating to the technological tools attributable to the data subject (IP Address, Mac Address, smartcard number, etc.), personal data such as date of birth, gender, social security number, etc., card data (IBAN, PAN), loyalty card, NDG, public transport pass number, car number plate, multimedia data (images, audio, video), video surveillance data.
- B) **Special categories of personal data**, such as:
 - **health data** - personal data relating to the physical or mental health of a natural person, including the provision of healthcare services, which reveal information relating to his/her health status;
- C) **Judicial data:** personal data relating to criminal convictions and offenses only to the extent required by the nature of processing or the nature of work of the respective employment position in accordance with applicable law and relevant guidelines of the Hellenic Data Protection Authority.

- iii. Tax ID number,
- iv. Data related to Legal Representative,
- v. Contact Details: Phone or Mobile number, Email address
- vi. Conviction/criminal offence data, such as personal data relating to criminal convictions and offences or related measures and only to the extent required by the nature of work of the respective engagement position and as provided for in the law,
- vii. Image data collected from the video surveillance systems in Nexi Greece premises, where relevant notification signs have been placed pursuant to the applicable law,
- viii. Access data to Company's networks and systems (User ID, Usernames, IP addresses etc.), in cases where such access is granted by the Company in the context of and for the purposes of the provision of Consultancy services,
- ix. Data required for verification purposes in the context of the protection of public health and measures for the protection against pandemic Covid-19 (such as demonstrating vaccination certification, self-test, rapid or PCR tests for the access to Nexi Greece premises).

It is noted that where the Consultant is a legal person, the above data refer to its administrators, representatives, contact persons, partners and members of management whose personal data are processed by the Company within the context of the provision of Consultancy services.

Purpose of the processing

Nexi Greece will process your personal data for purposes connected and instrumental to the execution of the contractual consultancy relationship and to legal obligations.

Among the above purposes are:

- a) administrative and financial management;
- b) processing and payment of remunerations for the provision of Consultancy services;
- c) management of company devices entrusted to you for the provision of the Consultancy services;
- d) management of access to internet and electronic mail systems as well as management of systems for the logical access to data, software and infrastructures when required in order to provide your Consultancy services to the Company;
- e) management of company security (identification of persons, physical access control to corporate buildings and other premises, by using video surveillance systems) and security of Company's systems and networks;
- f) fulfillment of contractual obligations derived from Nexi Greece contracts with its Clients (where the Consultancy services consist in call center services where monitoring and recording of business telephone conversations between contact center agents and Nexi Greece Clients' customers/employees/agents is required; such recordings are also provided to Nexi Greece clients and/or Nexi Greece Clients' customers for evidence and transparency purposes and/or for use towards authorities, pursuant to the provisions of the applicable legislation);
- g) analysis and implementation of corporate transactions (mergers, acquisitions, company/business units sales, joint ventures, consortia or other transactions),
- h) protection of public health and measures against extraordinary health emergency circumstances (such as those relating to pandemic of Covid-19).

Regarding the processing of personal data relating to the management of corporate electronic devices as described in case (c) above, this document expressly refers to and is aligned to Nexi Greece internal procedures and policies issued and updated on a regular basis.

Legal basis of the processing

The processing of your personal data is based on the following legal basis:

- (i) For the performance of contract and contractual obligations of counterparties,
- (ii) For the fulfillment of legal obligations to which the Company is subject and
- (iii) Where processing is necessary for the purposes of Company's legitimate interest, for internal administrative purposes and the prevention of fraud or other illegal activity as well as in defense of legitimate interests before an administrative or judicial authority, ensuring the protection of individuals, goods and public health.

Methods of processing of Personal Data

The processing of personal data is carried out by IT systems, manual and electronic means according to the procedures and processes strictly related to the processing purposes specified in this document, in compliance with the applicable provisions for security issues.

As far as video surveillance systems are concerned, these are used outside and inside of the Company premises to guarantee the security and protection of natural persons, company premises and company assets. Personal data collected through video surveillance systems will be stored for a period not exceeding the time necessary for the fulfillment of the purposes for which data are initially collected and will be processed in full compliance with the specific provisions of the EU General Data Protection Regulation 679/2016 (the **GDPR**), the Greek law 4624/2019 issued in implementation thereof and the harmonization of the Greek legislation with the provisions of the GDPR and the incorporation of Directive (EU) 2016/680 for the processing of personal data by public authorities with respect to criminal offences (the **Greek Data Protection Law**) and any other data protection laws and regulations applicable in Greece (collectively **Privacy Laws**) as well as the guidelines of the Hellenic Data Protection Authority on video surveillance.

Access and movement within the company premises is permitted through the use of corporate identification badge.

Period of Retention of Personal Data

The Company retains your personal data for the entire term of the contract for the provision of Consultancy Services. In case of termination of such contractual relationship, the Company may retain your personal data until the completion of the general limitation period for the exercise of legal claims, pursuant to the applicable legal provisions, namely twenty (20) years from the – under any condition – termination of the contractual relationship of the Consultant with the Company. In particular, as regards to any special categories of data relating to criminal convictions and offences, retention period may not exceed five (5) years from the – under any condition – termination of the contractual relationship of the Consultant with the Company. In the event that any legal actions or proceedings, concerning you directly or indirectly, remain pending at the expiry of the above period, the retention period will be extended until the issuance of an irrevocable court decision.

In the event that a shorter or longer retention period is provided for by the law or any regulatory act for the retention of your data, the aforementioned retention period shall be reduced or increased accordingly.

At the time the above retention periods have been fulfilled, your personal data will be securely deleted or rendered anonymous.

Access to Personal Data – Recipients

Personal data will be accessible by those persons (natural or legal) to which Nexi Greece has assigned the performance of specific job duties on its behalf (**Data Processors**) and to the individuals authorized to carry out processing activities in the context of their duties in relation to the purposes specified above.

Your personal data may also be disclosed to the following third parties, who will process them as **Independent Data Controllers** or Data Processors or individuals authorized to carry out processing activities for the above purposes specified in this document in connection to the Consultancy services, as well as to anyone who is a legitimate recipient of communications provided for by laws or regulations.

Data Processors	Independent Data Controllers
<ul style="list-style-type: none"> ▪ Nexi Group companies ▪ First Data Group companies and First Data Vendors during the transition period following the acquisition of the company by the parent company for use of global IT systems/ platforms and supporting services ▪ Physical Security company ▪ Third party Vendors engaged to host, manage, maintain and develop Nexi Greece IT systems ▪ Destruction companies ▪ Vendors supplying services to Nexi Greece in connection with the management or administration of staff, payroll or otherwise in connection to our engagement 	<ul style="list-style-type: none"> ▪ Third parties to which Nexi Greece is required by law to do so (such as tax or labor authorities, supervisory, judicial, independent and other authorities) ▪ Professional advisors (lawyers, consultants, certified accountants, auditing firms) ▪ Providers of work-related tools and services (such as vehicle leasing company, telecom services providers, business travel agency) ▪ Any third party for which you have given your permission to us or that the Company otherwise uses in connection with the Consultancy Services including private insurance companies and insurance intermediaries. ▪ Banking or Payment Institutions or other Institutions regulated by the Bank of Greece or any other European Regulator ▪ Clients, partners and vendors with respect to business contact details, limited business related information, recorded telecommunications ▪ Associations; Industry Associations; Certification Bodies ▪ Training and event planning companies ▪ Third parties interested in corporate transactions (M&As, JVs) and any related consultants; agents, business partners of theirs

Whenever the Company shares personal data with third parties, this is processed on a need-to-know basis and the individuals are subject to confidentiality obligations ensuring appropriate security measures.

Rights of the Data Subjects

You may at any time exercise the rights pursuant to articles 15-22 of the GDPR, such as access to the data concerning you, their rectification, erasure, restriction of processing, portability and objection to processing. At any time, you may also lodge a complaint with the competent supervisory authority (the Hellenic Personal Data Protection Authority). For more detailed information on the procedure to lodge a complaint, you may visit the official website of the Hellenic Data Protection Authority (Complaint to the Hellenic DPA) at https://www.dpa.gr/el/polites/katagelia_stin_arxi

You may also, and we encourage you to do so at any time, notify the Company or the Data Protection Officer (**DPO**) of any concerns relating to the processing and protection of your personal data under your existing contractual relationship with Nexi Greece.

Kindly note that the exercise of your rights may be subject to certain restrictions provided for under the GDPR and the Articles 33 - 35 of the Greek Data Protection Law.

If you wish to exercise your rights, you may contact the Data Protection Officer (DPO) using the addresses indicated below.

Data Protection Officer

A Data Protection Officer (**DPO**) is appointed and holds the responsibility for overseeing questions in relation to this Informative document for Consultants. If you have any questions or requests, including any requests for the exercise of your legal rights, please contact the DPO using the details set out below.

The Data Protection Officer can be contacted to the following email address: privacy.gr@nexigroup.com or the postal address: 2, Stratopedou AVYP, P.C. 14568, Krioneri, Attica, Greece.

Technical and Organizational Measures

Nexi Greece commits to implement and maintain the appropriate technical, organizational, administrative and physical security measures, which are necessary for the protection of Personal Data, against, amongst others, destruction, loss, alteration, unauthorized disclosure or unauthorized access to them.

To determine the appropriate technical and organizational security measures, Nexi Greece takes into account:

- the state of the art and international best practices;
- the nature, scope, context and purposes of processing;
- the risks of the use as well as the processing for the rights and freedoms of the Data Subjects, especially as a consequence of destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to transferred, stored or otherwise used (Personal) Data, either by accident, or unlawfully;
- the likelihood that the processing has an impact on the rights and freedoms of the Data Subjects;
- the recommendations of competent national Supervisory Authorities (e.g. Hellenic Data Protection Authority, Hellenic Authority for Communication Security and Privacy-ADAE), the PCI Standards, the

European Data Protection Board, the European Union Agency for Network and Information Security (ENISA) etc; and

- the applicable norms and standards.

All Nexi Greece personnel who processes personal data, receives relevant training on data protection principles;

Nexi Greece ensures that any personnel who has access to personal data has appropriate confidentiality obligations in their contractual or employment relationship with Nexi Greece.

Personal data are not transferred to a country or territory which has inadequate data protection laws, unless adequate safeguards are in place and in all cases, according to the provisions of the GDPR.

In case of an incident involving unauthorized access to personal data, Nexi Greece operates the applicable Data Breach Notification Procedure which is designed in compliance with applicable laws requiring notification of incidents based on GDPR and the Greek Data Protection Law provisions as well as the Hellenic Data Protection Authority (HDPa) guidelines. Where appropriate or required, Nexi Greece will also notify law enforcement competent authorities, financial or other regulators and/or state agencies (including the competent Supervisory Authorities).

These measures are reviewed and updated by Nexi Greece at regular intervals based on the state of the art and advanced guidelines regarding data breach incident(s) and their management.

Updating and modifying this Information Sheet on the processing of personal data

The Company may, in accordance with its applicable Data Privacy and Protection Policy and pursuant to the applicable legal and regulatory framework, modify or amend this Information Sheet.

All Consultants that have in any way established relationship with Nexi Greece **acknowledge they are informed** of all above, the updated version of which shall always be posted at Company's Internet site (<https://www.newsiagreece.eu>) and/or be notified to the Consultant via email.

I HAVE READ THE ABOVE LETTER AND ACKNOWLEDGE RECEIPT THEREOF.
ON BEHALF OF THE CONSULTANT:

[SIGNATURE][DATE]