



**instant
credit id**

Report

Description

The **Instant Credit ID** service provides a brief representation of financial information concerning your credit status and transactional behavior, based on data held by Tiresias.

It is common that in order to have a credit transaction completed (whether personal or on behalf of the Legal Entity you represent), the Business offering a product or service requires further and precise information about your creditworthiness, credit status and transactional behavior in general. Through the Instant Credit ID service, the Business receives your or the legal entity's financial data electronically for its own use and at the same time you receive your data recorded via the Instant Credit ID Report as a pdf file. The transmission of your financial data to the Business (in data form or pdf file) and the generation of the Instant Credit ID Report that you will receive are produced automatically, following an electronic request by the Business to Tiresias, after obtaining your **explicit consent**.

Purpose

The Instant Credit ID service aims at facilitating your transactions and the effectiveness of the assessment of the transactional/credit risk that the Business assumes in the context of a legitimate business activity in which you aim to participate. As part of this service, Tiresias processes your personal data to create a brief, objective, secure, and digitized report. The legal basis for this processing is your consent (legal basis – Article 6(1)(a) of the GDPR).

Data

The Instant Credit ID service provides information on **solvency ranking**, for **defaults on financial obligations** (Default Financial Obligations System), **mortgages and prenotations to mortgages** (Mortgages and Prenotations to Mortgages System) and **current – active or closed– credit accounts** (Credit Consolidation System). The data and information recorded in the aforementioned Tiresias' database are constantly updated.

In particular, it includes:

1. **Solvency Ranking**, based on the Scoring of your Credit Behavior (Behavior Score) and produced by the Credit Behavior Scoring System developed by Tiresias, based on the set of data available at that particular moment in the financial behavior data files (Credit Consolidation System) maintained by Tiresias.
2. Information **on default** (inability to repay) of **financial obligations** by category (e.g., bounced cheques, bills of exchange unpaid at their expiry, cancellation of loan and card contracts, orders of payment, auctions, seizures of immovable properties, prenotations converted to mortgages, etc.).
 - items, amount of debt per data category and total amount of debt
 - date of the most recent data entry by category
 - update of financial data by category, (repayment, cancellation, annulment, rejection, total removal, etc.)
3. Information concerning **Mortgages** and **Prenotations on mortgage** categorized by source including date of the most recent data entry, items and amount
4. Information on **current - active credit accounts** by category (e.g. consumer - housing - business loan, credit card, etc.)
 - approval amounts, installment amounts, and outstanding debts.
 - total amount outstanding
 - participation in credit accounts as guarantor (total loans, number of items and debt amount)
 - Indication of delay /delinquency indicator: refers to your repayment compliance (months of delay and debt amount by loan)
 - maximum repayment delay index over the last 12 months

5. Information on **closed credit accounts** by category (e.g., consumer, housing, business loans, credit cards, etc.), either as the principal debtor or guarantor.
 - Date of approval and debt closure.
 - Approval amount and outstanding debt.
 - Delinquency indicator at the time of closure (in months).
 - Closure reason.

How you and the Business receive the data provided through the Instant Credit ID service:

The data provided through the Instant Credit ID service is automatically and electronically sent to the Business based **on your prior written consent. Simultaneously** as the data are sent by TIRESIAS to the Business, you will receive a notification in your registered e-mail address, a link to retrieve the Instant Credit ID Report, and an additional PIN via SMS for access to the Report.

If the Instant Credit ID Report cannot be generated, you shall be informed by SMS.

Each Instant Credit ID Report has a unique code ("T-Code") and is time-stamped. The T-Code is valid for seven (7) calendar days from the issuance of the Report. Within this period, the same Instant Credit ID Report can be reproduced up to three (3) times.

Retention period

- **by Business:** The data provided through the Instant Credit ID service, the identification data, the granted consent (and any potential revocation thereof) is retained by the Business according to its retention policy, about which it is required to inform you.
- **by Tiresias:** The history of the Instant Credit ID Reports sent by TIRESIAS including both the formal details of the Instant Credit ID Report (i.e., date and time of issuance) and its content, is retained for a period of five (5) years from the date of the Report's issuance. The granted consent and any potential revocation there of (provided that is notified to TIRESIAS) are retained for 5 years from the date of the consent.

Data Security

Tiresias fully complies with the applicable data protection legislation and has implemented effective technical and organizational measures to ensure the security of your data.

Recipients / Third Parties to whom the data is disclosed

Authorized personnel of the Business and Tiresias have access to the data, as necessary to fulfill the stated purpose. Additionally, third parties (e.g., processors, cooperating companies, auditors) may gain access to your data.

Transfer of Personal Data to Third Countries

Your personal data is not transferred to third countries outside the European Economic Area (EEA), except where necessary for the performance of Tiresias' contractual or legal obligations, provided that all appropriate safeguards have been taken (for more information on data transmissions, you can contact the Data Protection Officer (DPO) – see below).

Rights regarding the processing of Personal Data

What are your rights and how they can be exercised towards TIRESIAS ¹

You have the following rights against Tiresias (with regard to the data it processes and concerns you):

- a. To know if and which of your personal data are processed by Tiresias, their origin, the purposes of their processing, the recipients or categories of recipients, the period of data storage, the origin of the data, the existence of a right to request the rectification or erasure of data or the restriction of processing or a right to object to such processing, the right to lodge a complaint before the Authority (**right of access - Article 15 GDPR**).

Also, in the context of exercising the right of access, you have the possibility to be informed whether the recipients of the data of your records have searched the records of Tiresias in the last twelve months (number and origin), including any

¹ The rights described in this section apply to data subjects - natural persons. However, TIRESIAS provides the same service to legal entities regardless of their form.

Standard application forms are used to facilitate data subjects (and legal persons) to exercise their rights and to ensure that their requests are dealt with quickly and fully.

activation of the emergency notification (alarm) service in case of registration or deletion of data concerning you, as well as the data sending through the Instant Credit ID service.

- b. Request that your personal data be corrected and/or completed, so that your personal data is complete and accurate (**right of rectification - Article 16 GDPR**). You should provide any necessary documents showing the need for correction or completion.
- c. Request the deletion of your data in accordance with Article 17 of the GDPR (**right to erasure**).
- d. Request the restriction of the processing of your data (**right to restrict processing**); in accordance with Article 18 of the GDPR.

Upon granting the request, the indication "has exercised the right to restrict processing in respect of the data" will appear in the place of the data in question in the file, which evaluated at the recipients' discretion.

Following the exercise of the above right, Tiresias shall investigate the disputed data and, based on the result of this investigation, either delete the data or remove the restriction after having informed you in advance.

The right to not transmit data, as described immediately below, also falls within the context of the right to restriction of processing.

- e. Request the portability of your data, in accordance with the requirements of Article 20 of the General Data Protection Regulation (Right to data portability).

In connection with the exercise of the above rights, please note the following:

- The data that Tiresias records in its archives is absolutely necessary for the purpose of processing. Additionally, data processing and maintenance in general by Tiresias is necessary for compliance with its legal obligations for the purposes of the legitimate interests of the data recipients (which override the rights and freedoms of the data subjects) as well as for the performance of a contract between them and the data subjects. Tiresias has, in accordance with the above, the right to refuse your request for restriction of processing or erasure of your personal data if the request is not sufficiently substantiated, if the processing of the data is necessary in accordance with the law or for the establishment, exercise or support of its legitimate rights.
- Despite the above and despite the fact that this right is not provided for by the GDPR, but was granted to the subjects under the regulatory framework of the Greek Law No 2472/1997 and the regulatory decisions of the Personal Data Protection Authority as a form of the right of objection provided for therein, if you wish, Tiresias may cease to transmit your data to the recipients of its records, by transmitting to them the indication no data transmission. Exceptionally and on the basis of your subsequently granted consent/authorization, the data sent via the Instant Credit ID service shall be transmitted to the Business and the My Instant Credit ID Report shall be issued normally.

The afore mentioned right is a more specific manifestation of the right to restriction of processing (Article 18 GDPR).

- The exercise of the above rights cannot be exercised retroactively and does not affect data processing already carried out.

- f. You can submit a complaint to the Personal Data Protection Authority (www.dpa.gr) where you consider that your rights have been infringed in any manner (right to complain).

To enable you to exercise your rights, Tiresias operates a Public Service Office during working days from 08:30 to 14:00 (1 Alamanas, 151 25 Maroussi). On working days from 09:00 to 16:00 there is a call center in operation at 210 3676700. In addition, you can address your request in writing to the above address of Tiresias or electronically at the e-mail address (e-mail) tiresias@tiresias.gr and you may find useful information on the exercise of the above rights on the Tiresias website <https://www.tiresias.gr>.

Tiresias will reply to your request within thirty (30) days from its submission, except in exceptional cases, in which case the above deadline may be extended for up to sixty (60) additional days if necessary, taking into account the complexity of the request and/or the number of requests, in accordance with the legislation. In any case, Tiresias will inform you in all events in good time about the said extension in the deadline.

- g. As this processing of your personal data is based on consent, you have the right to withdraw your consent at any time, as detailed below. It is clarified that the consent is valid for a single request for the issuance of the Instant Credit ID Report by the Business and for a period of seven (7) days from its issuance. You are entitled to revoke it at any time prior to the receipt of the Instant Credit ID Report by the Business. Any revocation of your consent communicated to the Business or Tiresias after the Business has received the Instant Credit ID Report and within the designated publication/transmission period (seven days) will result in the cessation of further posting or transmission of the Instant Credit ID Report. Any revocation of your consent communicated to the Business or Tiresias after the Business has received the Instant Credit ID Report and beyond the designated seven-day period will have no effect.

Withdrawal of consent granted to the Company or Tiresias

At any time you may withdraw your consent to the Business by:

- Visiting the TSEK platform, selecting the Instant Credit ID service and then the Consent Withdrawal (only when the consent has been given through e-gov.gr).
- Contacting the Tiresias' call center (+30210 3676700, on business days from 09:00 to 16:00)
- Visiting the Customer Service Office on business days from 08:30 to 14:00 (1 Alamanas Str, 151 25 Maroussi)
- Sending In writing to the above address of Tiresias or by e-mail to tiresias@tiresias.gr
- Informing the Business of the consent withdrawal. In this case, the Business must not request the provision of your data and must inform Tiresias immediately thereof.

In case of consent withdrawal, the data is not transmitted to the Business and the Instant Credit ID Report is not issued.

Tiresias shall not be held liable for the transmission of data and the issuance of the Instant Credit ID Report that have taken place prior to being informed of the consent withdrawal.

Where you can address to for the progress of your Requests?

For further information you can call during business days and hours at +30 210 3676700 (Customer Service Office).

What is the applicable law when we process your Data?

We process your Data in accordance with the General Data Protection Regulation 2016/679/EU, the applicable Greek legislation on personal data protection and in particular Law and the regulatory administrative decisions of the Hellenic Data Protection Authority (Law 4624/2019, Law 3471/2006).

Data Protection Officer (DPO)

Tiresias has appointed a Data Protection Officer in accordance with Article 37 of the General Data Protection Regulation (tel. 210 3676700, dpo@tiresias.gr, Alamanas 2 151 25 Maroussi).

In case you wish to exercise any of your rights, you should contact **ONLY** Tiresias and not the Company.

BANK INFORMATION SYSTEMS S.A.

2 ALAMANAS STR, 15125, MAROUSI

General Commercial Register (GEMI) Reg. no. 002594101000