

GTA GT

PRIVACY STATEMENT

I. INTRODUCTION

Greek Tied Agent Single Member P.C. (hereinafter GTA GT) strive to build strong and lasting relationship with clients, based on confidence. Compliant processing of your personal information has the same priority as the quality of the services we provide. We believe in the power of personal data; thus, we keep it safe and confidential and use it responsibly in accordance with appropriate laws.

This Privacy Statement is intended to describe our privacy practices and provide information about how and why we collect, use and share your personal data, information about your rights granted by privacy laws, especially under the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the data protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation – “GDPR”), as well as the Law No. 4624/2019 on the protection of individuals with regard to the processing of personal data into Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and the transposition into national law of Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016.

Data privacy principles we follow:

- We collect, use, process and protect your personal data in accordance with laws, (Lawfulness)
- We do not use your data for purposes other than those specified in Privacy Policy, (Purpose Limitation)
- We do not keep your data if it is no longer needed. (Data minimalization)

II. ABOUT US – DATA PROCESSOR’S DETAILS

GTA GT (“Data Processor”), KI Building, Division 1, 1st Floor, Palaia Leoforos Poseidonos 1 kai Mwraitini 3, Palaio Faliro, 175 61, Athens, Greece & Heraklion Avenue 466, 1st Floor, Heraklion 141 21, Attica, Athens, Greece

web: <https://gtagt.gr> **tel.:** +30 210 94 24 358 (Faliro) & +30 210 28 32 546 (Heraklion), **email:** presentation@gtagt.gr

GTA GT is a registered Tied Agent of BCM Begin Capital Markets CY Ltd (“Data Controller”), with registration number 338839. BCM Begin Capital Markets CY Ltd is registered and licensed by the Cyprus Securities and Exchange Commission (hereinafter the “CySEC”) with license number 274/15. You might check the Controller’s Privacy Statement [here](#). Aegean Equity is supervised by the Hellenic Capital Market Commission (“HCMC”), which is the regulator in the territory of Greece, and it is registered in the General Commercial Register with register number 150323701000.

Data Processor processes personal data on behalf of the Data Controller.

III. DATA COLLECTION

As part of Data Controller’s client account opening procedures and ongoing obligations need to abide the legislative framework currently in place with Hellenic Capital Market Commission. Specifically, the Data Controller shall comply with its legal obligations under the Prevention and Suppression of Money Laundering Activities Laws of 2007-2021, as amended, for the establishment on the Client’s economic profile and prevention of money-laundering as well as abide with the relevant record keeping obligations under the European Commission Delegated Regulation (EU) 2017/565 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organizational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive (‘Delegated Regulation’). and Law 87(I)/2017 for establishing the suitability and appropriateness of each Client based on the services offered by each Investment Firm (Suitability & Appropriateness Tests) and recordings of telephone conversations, client transactions, FATCA and CRS.

IV. TYPES OF PROCESSED DATA

Personal Information

- Name
- Date of Birth
- Place of Birth
- Nationality
- Email
- Telephone number
- Copy of Passport / ID card

- Utility bill

Bank and tax information

- Tax Identification Number
- Tax residence
- Bank account details

Professional information

- Employer's name
- Profession
- Industry of Employment
- Knowledge and experience

Financial information

- Gross Annual Income
- Net Worth
- Anticipated amount to invest

The Data Processor may also collect Your Information regarding your use of our website(s), such as pages visited, your IP address, frequency, duration of visit.

V. DATA PROCESSING PURPOSES

GTA GT as a registered tied agent of the Data Controller for whom it solicits new potential clients and provides its administrative support, especially during the onboarding process.

We collect your personal data for the purpose of providing safe, effective and personalized services. Generally, we use your personal data for example for creation, development, running and improvement of our services, as well as our content, advertisement, prevention of losses, fraud prevention and potential misuse.

Your personal data will not be transferred to third countries, where the appropriate level of data safety is not guaranteed.

We collect your personal data for the following purposes:

1. Registration, creation and administration of your account:

Your personal data are being processed for the purpose of creation and administration of the account and registration to use our services. The scope of collected personal data is set by a legislative framework currently in place with Hellenic Capital Market Commission, in accordance with part III of this Privacy Statement.

Lawful basis: The processing of personal data is necessary for the performance of a contract.

2. Monitoring compliance

Monitoring compliance while providing services is the legitimate interest of the data processor. It especially applies to the behaviour of data processor employees during the communication with clients or potential clients.

Lawful basis: The processing of personal data is the legitimate interest of the data processor.

3. Improvement of provided services

Monitoring the activity, the usage of the site and its functionality with the aim of improving technology and providing better quality services.

Lawful basis: The processing of personal data is the legitimate interest of the data processor.

4. Processing statistical data

Creation and processing of statistical data in order to improve provided services and to monitor the activity of the users and the effectivity of providing service.

Lawful basis: The processing of personal data is the legitimate interest of the data processor.

5. Executing phone calls

Telemarketing, as the form of direct marketing of our services to potential clients over the phone calls might include outbound calls, inbound calls, lead generation, and sales call.

Lawful basis: The processing of personal data is the legitimate interest of the data processor.

In some cases, the processing of personal data is based on client's consent.

6. Sending marketing offers

Email marketing, as the form of acquiring new clients that register through the web form.

Lawful basis: The processing of personal data is based on person's consent and/or is necessary for the conclusion and performance of the contract.

7. Customer service

Ensuring proper and timely handled approaches and complaints in order to ensure the client's comfort and satisfaction.

Lawful basis: The processing of personal data is the legitimate interest of the data processor.

8. Fulfilment of administrative, tax and other legal

The legal obligation of the processor is to fulfil the tasks related to administration, accounting, taxes and other laws set by appropriate laws.

Lawful basis: The processing of personal data is necessary for compliance with a legal obligation to which the controller is subject.

In some cases, we base the processing of your data upon your consent. For example, you might agree that your personal information will be used to send you marketing communications by email or phone or other forms. We collect only freely given, specified, informed and unambiguous consent.

VI. DATA RETENTION PERIOD

The Data Processor stores personal data for the period that aligns with purpose, for which it was originally collected, bearing in mind the data minimalization principle.

Data provided upon your explicit consent for the marketing purposes will be stored for the period of 12 months, unless such consent is revoked earlier. However, some data might be further processed based on the other lawful basis.

VII. DATA RECIPIENTS

As part of using your personal information for the purposes set put above (V.), we may disclose your information to:

- Service providers and specialist advisers who have been contracted to provide us with IT, financial, regulatory, compliance, accounting and/or other services,
- Regulatory Authorities.
- Relevant authorities to investigate or prevent fraud, money laundering or other illegal activity.
- The Data Processor's employees to exercise their duties to further the Agreement between us, or to assure the efficient provision of services

VIII. DATA PROTECTION

Your personal data will be stored in accordance with the security policy (incl. Privacy policy) of the Data Processor and only for the time necessary to fulfil the purpose of the processing.

Your personal data will only be accessed by persons authorized by the controller to process personal data that are processed by the controller in accordance with the controller's security policy.

Data processor encompasses privacy by design and default as an approach when implementing systems and applications.

Your personal data is backed up, in accordance with the retention policy of the processor. Your backup data will be completely deleted as soon as it is possible in accordance with the backup rules. The personal data stored in the backup repositories serves to prevent security incidents, in particular disruption of data availability as a result of a security incident. The Controller is obliged to ensure data backup in accordance with the security requirements of the Regulation and the Personal Data Protection Act. We only store your personal information for a limited period, and it will be deleted when it is no longer needed for the purposes of processing as set out in the appendix to this statement.

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

Data Processor has taken all the necessary steps to protect the personal information, the personal information that it holds from misuse, loss, unauthorized access or disclosure and implemented appropriate measures, e.g. SSL technologies for cryptographic data transfer, PCI scanning for active protection of our server, Cryptographic protection of databases, Antivirus software etc. Full and detailed disclosure of security measures would weaken the security; therefore, we state it only partial and not in full scope.

IX. YOUR RIGHTS IN RELATION TO YOUR DATA

The Right to access:

You have the right to be provided a copy of the personal information we have about you, as well as information about how we use your personal information. In most cases, your personal information will be provided electronically. However, the way, how the right to access shall be fulfilled depends on the nature of personal data, the medium on which it is stored and with regards to the data protection of other subjects. If you require additional copies, we may charge you a reasonable administration fee.

The Right to rectification:

We take reasonable steps to ensure the accuracy, completeness and timeliness of the information we have about you. If you believe that the information, we hold is inaccurate, incomplete or outdated, please feel free to ask us to modify, update or complete this information by giving us notice.

The Right to be forgotten:

You have the right to ask us to delete your personal data, for example, if the personal data we have collected about you is no longer necessary to fulfil the original purpose of the processing. However, your right must be assessed in the light of all relevant circumstances. For example, we may have certain legal and regulatory obligations, which means that we will be unable to comply with your request.

The Right to object to processing:

In certain circumstances, you may ask us to stop using your personal information. For example, if you think that the personal information, we have about you may be inaccurate, or if you think we no longer need to use your personal information.

The Right to withdraw consent:

We may process your personal data with your consent. We will be informed in advance about such processing. In cases where we process your personal data with your consent, you have the right to revoke that consent at any time. You may withdraw the consent electronically, at the Responsible Person's address, in writing, by notice of withdrawal of consent or in person at the Office. Revocation of consent does not affect the lawfulness of the processing of personal data that we have processed for you.

The Right of data portability:

In certain circumstances, you have the right to ask us to transfer the personal information you have provided to another third party of your choice. However, the right to portability applies only to personal data that we have obtained from you under consent or under a contract to which you are a party.

The Right to restrict processing:

You have the right to object to data processing that is based on our legitimate interests. If we do not have a valid legitimate reason for processing and you object, we will no longer process your personal data.

The Right to notify the Data Protection Authority (DPA):

If you believe that we are processing your personal data unfairly or unlawfully, you may file a complaint with the supervisory authority: *Hellenic Data Protection Authority, Kifisias Avenue 1-3, 115 23 – Athens, dpa.gr.*

In all cases, when you want to exercise your rights, give us notices or ask any questions, do not hesitate and contact us at presentation@gtagt.gr

X. UPDATES OF THE STATEMENT

This Statement is subject to change without notice. For this reason, you are advised to look for updates from time to time.

