

Ancoria Bank Ltd (hereinafter the “Bank”), in full transparency and respect of your rights and personality, collects and further processes personal data only for specified, explicit, and legitimate purposes, within the scope of its business relationship with you.

This Privacy Notice (hereinafter the “Notice”) provides an overview of how the Bank processes personal data via its electronic channels, in accordance with all applicable data protection legislation, and particularly with the General Data Protection Regulation, 2016/679, of the European Union (hereinafter the “GDPR”).

For the purposes of this Notice:

- The term “Electronic Channels” refers to the Bank’s website, online banking and mobile applications,
- Personal data refers to any information about you that establishes or can establish your identity, for example your name and surname, your telephone number, email address.
- Personal data processing refers to any act or series of acts performed on your personal data, including, inter alia, collection, recording, organization, structuring, storage, data search, use, any way of disposal, erasure or destruction.

1. Who we are

Legal Name: Ancoria Bank Ltd
Registration No.: HE 324539
Address: 12 Demostheni Severi Avenue, 1st Floor, 1080 Nicosia
P.O. Box 23418, 1683 Nicosia, Cyprus
Phone Number: +357 22 849001
Fax Number: +357 22 849002
Email: info@ancoriabank.com
Website: www.ancoriabank.com

Contact details of the Data Protection Officer of the Bank:

Address: 12 Demostheni Severi Avenue, 1st Floor, 1080 Nicosia
P.O. Box 23418, 1683 Nicosia, Cyprus
Phone Number: +357 22 849001
Fax Number: +357 22 849002
Email: dpo@ancoriabank.com

2. From which sources is your personal data collected through the Electronic Channels and how it is processed?

The Bank may collect and further process the following information about you:

- Information that you provide to the Bank when using the Electronic Channels, for example when you fill out a web form.
- Information about your personal computer or mobile device, including your IP address, operating system and browser type, for the improvement of user experience or for analytical purposes.

The Bank may also request your personal data if you experience any technical or other issues when using its Electronic Channels.

3. Cookies

Ancoria Bank places great value on your privacy when using the Electronic Channels. The Bank aims to provide you with clear and explicit information about the technologies used and your choices when it comes to these technologies. If you do not consent to the use of these technologies, please be sure to block or disable them using your browser or device settings or the opt-out links identified herein below.

What are cookies?

Cookies are small text files that are sent to and stored on your computer, smartphone or other device. To find out more about cookies, please visit <http://www.allaboutcookies.org/>

Use of cookies

Ancoria Bank, uses cookies for a variety of reasons, such as to let users navigate between pages efficiently, verify the user and carry out other essential security checks.

Third party cookies

Ancoria Bank also uses the following third party cookies:

(a) Google Analytics: these cookies help the Bank to analyse how its website is used. This is performed by gathering anonymous data in order to optimise the website and deliver the best possible experience. Further information can be found in the official Google Analytics documentation, [here](#):

(b) Crashlytics: a service which collects data of users of the Ancoria Bank Create app on Android or iOS. It collects data on app usage, especially related to system crashes and errors. Thus, information about the device, the app version installed, in addition to other information, can help the Bank to fix bugs, particularly with respect to users' software and hardware. Further relevant information can be found in Crashlytics' privacy policy, [here](#).

Opting out

You can use the settings within your browser or device to control how cookies work. To find out how to reject or delete cookies, please visit <http://www.allaboutcookies.org/>

To opt-out of cookies related to Google Analytics, please [click here](#).

4. Retention of personal data processed via electronic channels

Any personal data collected and further processed through the Electronic Channels is kept only for as long as necessary for fulfilling the purpose for which it was collected. More specifically:

A. Website forms: **2 years**

B. Cookies:

Cookie Name	Platform	Description	Retention Period
_ga	Ancoria Bank Website	Used to distinguish website visitors and generate usage statistics	2 years
_gid	Ancoria Bank Website	Used to distinguish website visitors and generate usage statistics	24 hours
_gat	Ancoria Bank Website	Used to throttle the request rate (limit the percentage of requests)	1 minute
*	myAncoria (Web)	Used to trust your browser	180 days
Crashlytics	Ancoria Bank Create	Used for crash reporting	90 days

C. myAncoria: Upon expiration and/or termination of the contractual relationship with you, the Bank will retain your personal data for a period of up to 10 years

D. Ancoria Bank Create: If your application is successful, the Bank will retain your personal data for a period of up to **10 years**. In the event that your application is not complete successfully, the Bank retains your personal data for a period of up to **6 months** from the date you are notified of the rejection of your application or from the time you withdraw your application.

It is noted that the retention of your personal data may be extended in the event of legal proceedings or any investigation by an official or supervisory authority of the Republic of Cyprus or the European Union.

5. Who receives your personal data?

Within Ancoria Bank

In the context of the Bank's operation, various Bank departments may receive your personal data. This is done in order for the Bank to carry out its contractual and legal obligations, as well as to be able to offer you better service.

Outside Ancoria Bank

The Bank may from time to time assign the processing of your personal data to third parties referred to as "Data Processors". In such cases, the relevant information to be transmitted will be restricted to the minimum necessary and will only be used for specified and explicit purposes.

In addition, the Bank ensures that each Data Processor provides adequate assurances and that it processes your personal data in accordance with the GDPR (e.g. by signing confidentiality and data processing agreements).

Indicatively, and without limitation, the Bank's Data Processors include:

- (a) companies managing technical support services (IT and Cloud Providers).
- (b) companies involved in card payment management and processing, such as JCC Payment Systems Ltd, SIA S.p.A., PSI-Pay Ltd and Mastercard® International Incorporated.
- (c) companies providing archiving services, as well as companies providing marketing services.
- (d) companies providing electronic signature solutions such as DocuSign France (with headquarters in the United States)
- (e) companies managing non-performing loans.
- (f) debt collection agencies.

In addition, and in order to comply with its legal and/or regulatory obligations, as well as to fulfil its contractual obligations towards you, the Bank may transfer your personal data to various government authorities or agencies and/or other organisations, such as:

- (i) The European Central Bank (ECB), the Central Bank of Cyprus (CBC), the Cyprus Securities and Exchange Commission (CySEC), and the European Investment Fund (EIF),
- (ii) Artemis Bank Information Systems Ltd,
- (iii) MOKAS, in the context of compliance with court orders,
- (iv) Tax authorities, and/or other government departments/agencies for the purposes of state allowances provision,
- (v) Valuers, consultants, auditors,
- (vi) Correspondent banks such as the Bank of New York Mellon, and/or
- (vii) Other financial institutions or similar organisations.

6. Is personal data transferred to third countries or international organisations?

Your personal data is transferred to third countries (countries outside the European Economic Area - EEA), only in cases where it is necessary in order for the Bank to provide you with its services, or where it is necessary in order to carry out your instructions (e.g. payment orders, investment orders), or when you provide the Bank with your consent.

In any case, the Bank ensures that the organisation receiving your personal data provides the necessary safeguards and an adequate level of data protection in accordance with the GDPR.

7. What are your rights according to the GDPR?

You can exercise the following data protection rights under to the GDPR:

- (a) **right to access personal data:** Under this right, you may receive information which concerns you free of charge and/or obtain copies of your personal data held by the Bank.
- (b) **right to rectification of personal data:** Under this right, you may at any time request to correct or complete your personal data.
- (c) **right to erasure (“right to be forgotten”):** Under this right you can request the Bank to delete your personal data.

It is clarified that the Bank reserves its right to deny the said erasure, if the processing is necessary for the Bank to comply with its legal obligation, for reasons of public interest and/or for the exercise of its legal claims.

- (d) **right to restriction of processing of your personal data:** Under this right you may request the Bank to restrict the processing of your personal data if you contest its accuracy, the lawfulness of its processing and/or because it is not necessary for the processing purposes they had been collected for and/or when you have already objected to the Bank in processing your data in accordance with the **right to object** below and you expect the Bank's position as to the legitimate grounds which override your opposition.
- (e) **right to data portability:** Under this right, you may receive your personal data, in a structured, commonly used and machine-readable form, and to transfer it to other organisations/ companies or ask the Bank to directly do so on your behalf.
- (f) **right to object:** You have the right to object to the processing of your personal data, including profiling, based on the legitimate and/or public interest when you deem that this is justified due to a particular situation that concerns you.
- (g) **right to withdraw your consent:** as mentioned in section 3.3 above, you reserve the right at any time to withdraw your consent to collection and processing of your personal data. In such case, the withdrawal of the consent does not affect the legality of the data processed prior to the revocation.

It is noted that the abovementioned rights apply with the restrictions provided for under the GDPR. If you wish to exercise any of the above rights or for any questions regarding the processing of your personal data, you may contact the Banking Centre you collaborate with, the Bank's Customer Service Centre, the Bank's Data Protection Officer (dpo@ancoriabank.com) or fill out the relevant form through the Bank's website (www.ancoriabank.com).

8. Links to electronic services of third parties

Some of the links on the Electronic Channels may lead to websites of third parties with their own privacy notices, which may be different to this Notice. Should you choose to follow these links you should read these third party notices carefully in order to be properly informed on the collection and further processing of your personal data.

9. Information security

The Bank implements a range of controls in order to maintain the confidentiality, integrity, and availability of your personal data. These measures cover physical and environmental security, the security of the Bank's technical infrastructure and information systems, as well as the organisational aspect of information security. Any Bank personnel and any third party who carries out any data processing on the behalf of the Bank is required to follow strict compliance standards and is obligated to protect personal data and apply appropriate measures for the use and transfer of such data.

10. How can you file a complaint?

In case you have any complaint and/or dispute in regard to the way your personal data is processed, you are kindly requested to notify the Bank through the aforementioned communication channels and the Bank will immediately undertake to investigate and inform you in regard to your complaint.

In addition, you are entitled to submit a complaint to the Commissioner for Personal Data Protection of the Republic of Cyprus. You can find information regarding the filing of complaints on the relevant website (<http://www.dataprotection.gov.cy>).

11. Amendments to the Privacy Notice for Electronic Channels

The Bank reserves the right to amend this Notice from time to time by informing you accordingly.

In any case, you are always invited to periodically visit the Bank's website (www.ancoriabank.com) for information on the updated edition of the Notice and/or for any other useful information.

Do not hesitate to contact us via the Bank's Data Protection Officer for anything you may need regarding the present Notice and/or for other issues related to data protection.