

Data Privacy Notice

Protecting your data is a priority for us. At COSMOTE, we fully understand the importance of protecting your personal data. This Privacy Notice applies to both subscribers and users of fixed, mobile and internet access services. That is why we take all the necessary measures to ensure for the security and proper management of your data.

1. What personal data do we process?

By personal data we mean any information that concerns you and through which we can identify you. This recognition can be made either through specific information or through a possible combination of the information available to us.

OTE and COSMOTE, as telecommunication providers and for the purposes described in paragraph 3 hereinafter, process the following categories of personal data.

A. Simple Personal Data

- i) **Data stemming from your contract with OTE and / or COSMOTE (hereinafter Contract Data)** such as your name, ID number (ID) or passport or other document used for identification, tax identification number (TIN), address of residence and / or billing address, rateplan, date of birth, profession, nationality, contact details (phone, email), connection number that you activate in the network of OTE or COSMOTE, Social Security Number (AMKA), date of conclusion of the contract between us, username and password to connect to the internet access service.

It is noted that in the case of special tariff plans (e.g. plans for People with Disabilities), we process a very limited range of special categories of data (e.g. certificate of disability), in order to conclude the relevant contract.

- ii) **Data about the terminal equipment (hereinafter Equipment Data)** that you use for your connection to the OTE or COSMOTE network, such as the IMEI number of the mobile device(s) that you have activated in our network, the SIM card number, the serial number and the MAC Address of the Router.
- iii) **Information about your account and / or prepaid balance renewals (hereinafter Billing Data)** such as billing and / or renewal time, payment date and amount, method of payment (by standing order, by credit card, in-store payment or payment through the My COSMOTE application), credit card details, IBAN.
- iv) **Data concerning the communications between us (hereinafter Service Data)** such as the history of your communications with OTE and / or COSMOTE and specifically your recorded conversation with the Customer Service Unit for transaction proof purposes or for similar legal purposes, the recorded instructions given to the IVR (Interactive Voice Response) system, which is stored in the form of text (voice to text), your requests / complaints to Customer Service or in a store or in any other way you contacted us (e.g. via e-mail, chat, corporate seller), time and manner of handling your complaints, faults you have reported and time to repair them.

B. Traffic & Location Data

- i) **Traffic Data (hereinafter Traffic Data):** Traffic data means the data processed for the purpose of transmitting a communication to an electronic communications network or its billing. Traffic data may include, but are not limited to, the number, address, the identity of the connection or the terminal equipment used by the subscriber or user, passwords, the beginning and ending date and time of the communication, and the duration of communication; the volume of data transferred, as well as information on the protocol, formatting, routing of the communication, the origination and termination network.

The traffic data we process includes:

➤ **For mobile and fixed telephony:**

- the date, time and duration of a connection, your telephone number and the telephone number of the caller, the SIM card number (IMSI) and the mobile number (IMEI) from which the call was made.
- location data that is necessary to ensure that you can use our telecommunication services at any time and that is necessary to transfer communication through our network.

➤ **For connection to the Internet:**

- the date, time and duration of your internet connection (internet session), technical characteristics of your connection (such as connection speed), Username and password and email, which you used to activate your connection, the IP address you connected to, the MAC address and mobile number (IMEI) from which you connected to the Internet
- Information regarding the websites you visited (urls), which are necessary for your routing to the site you wish to visit

- ii) **Location Data (hereinafter Location Data):** Location data is defined as data that is processed on an electronic communications network or by an electronic communications service and indicates the geographical location of the user's terminal equipment of a publicly available electronic communications service.

The way we process Traffic Data and Location Data is regulated by specific legislation regarding the processing of personal data in the field of electronic communications (Directive 58/2002), which was incorporated into Greek law by L. 3471/2006, in conjunction with the General Regulation for the Protection of Personal Data (GDPR) and Greek L. 4624/2019.

Find the relevant legislation [here](#) (GDPR) and [here](#) (Law 3471/2006) and [here](#) (Law 4624/2019).

2. What is the processing of personal data?

The processing of personal data is any operation or set of operations which is performed on personal data or on sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Obviously, everything trusted to us is safe, because:

- We store only the minimum necessary personal data, according to the purpose of the processing,
- We process data within the boundaries that guarantee their safety and protection against unauthorized or illegal processing and accidental loss, destruction or damage, utilizing appropriate technical or organizational measures.

We also ensure you that we, OTE and COSMOTE do not process or store the content of your communication.

We inform you that this notice presents general information provided by OTE and COSMOTE regarding the processing of personal data during the provision of telecommunication services. Should you activate services provided by OTE or COSMOTE other than fixed telecommunications and internet and / or mobile telecommunications, please find information about the processing of your personal data per service [here](#) or on the relevant service site. Specific terms related to the processing of your personal data for the provision of any service are always construed in conjunction with these terms.

3. For what purposes do we process your personal data?

(A) We process your data to serve your contract or to take action during the pre-contractual stage.

For the preparation of a contract for fixed telephony and internet or mobile services with OTE and / or Cosmote, for the provision of our services, or to submit an application for the purpose of concluding it, for the transmission of your communication in our network and for billing you according to the use of each service and for the verification of the billing process, we process the data referred in Section **What personal data do we process**.

As part of the interconnection of our network for the transmission of communication, we may transfer your personal data to other telecommunications network providers located in or outside the European Union.

Another processing activity, **which is inextricably linked to the provision of our services to you, is troubleshooting**. Specifically, COSMOTE and OTE collect and **process Traffic Data and Location Data of subscribers and users**, in order to provide effective troubleshooting, when you call us mentioning a problem e.g. related to the coverage or quality of the network, e.g. call interruption, poor call quality, slow WiFi access, frequent Internet disconnections, etc. In these cases we process your data to determine if it is a general problem of the particular area or if it concerns only your connection, in order to manage the problem as efficiently and

quickly as possible. In addition, this data may be used for precautionary measures in order to ensure the smooth operation of the services provided.

Finally, in the context of serving our contractual relationship, and within the framework of the current legislation, OTE and COSMOTE or their partners process Simple Personal Data in order to contact you via email or sms, by post or even by **phone in order to send updates regarding the service of your contract**, such as e.g. to inform you about the issuing of your bill.

(B). We process your personal data based on your consent to create your personal profile.

In addition to the execution of the existing agreement between us, OTE and COSMOTE may process your personal data on another legal basis, such as your consent.

Specifically, OTE and COSMOTE may, following your consent, process in combination your personal data derived by many of their services provided to you, in order to create your personal profile based on your personal preferences.

Profiling is a form of processing your personal data by automated means, that we may use to evaluate certain of your preferences, so as to predict products and services that you might be interest to and send you the relevant updates/ newsletters/ ads, based on your interests

Read the text providing consent [here](#).

(C). We process your personal data based on the legitimate interest of OTE and Cosmote or of our subscribers

OTE and COSMOTE may process your personal data based on our legitimate interests, always considering your corresponding consumer rights and interests. These specific types of processing, based on our legitimate interest, are conducted after carefully balancing our legitimate interests and the need to protect your personal data and are limited to the expected processing type compatible with our contractual relationship. These types of processing are:

- i. **For the direct marketing of our products and services**, OTE and Cosmote may process a limited range of your personal data and in particular Contract Data, Billing Data, Service Data and Equipment Data. This processing is **limited** and is intended solely for the purpose of submitting proposals and offers similar to yours and which are tailored to your specific needs. Examples of such messages are messages for offers in our retail network, contract renewals and pre-paid cards, or Internet speed upgrades. We will communicate with you in the contact details that you have disclosed to us in an earlier transaction or during the conclusion of your contract.
- ii. Processing of your Contract Data, Billing Data, Service Data and Equipment Data may be performed by both OTE and COSMOTE for the purpose **of performing surveys or evaluation of specific products or services**. These surveys are usually in the form of a questionnaire and can be sent to you by email, SMS via an IVR system or via telephone calls. They can also be carried out on our behalf by other research companies.

- iii. We may process your personal data in order to **ensure the security of our network and IT systems or to prevent telecommunication fraud**. In this context, we process Traffic and Location Data to prevent unauthorized access to our network and information systems and to prevent cyber attacks or even to protect our subscribers and to prevent or detect telecommunications fraud and prevent excessive or unusual use of our services.
- iv. As part of their gradual operational integration of OTE and COSMOTE, we have proceeded to the mutual processing of our subscribers' personal data, **in order to provide the best possible services and unified customer service**. This means that OTE and COSMOTE, individually or collectively, determine the purpose and means of the processing of your personal data confided to us. The purpose of this processing is **to enable our Customer Service to provide a unified customer service to the fixed and mobile subscriber** and to offer tariff plans that perfectly match your telecommunication needs. In addition to OTE and COSMOTE, the stores of our network and the retail network of our partners have access to this information in order to provide you with a unified customer service.
- v. Both OTE and COSMOTE retain the **right to perform pre-contractual credit assessment in order to safeguard our legal business interests, prevent telecommunication fraud and safeguard the interests of our prospective clients**. This pre-contractual assessment is carried out as follows:
 - a) **In case you have previously been an OTE or COSMOTE subscriber:** we process by automated means data that we already have in our information systems. In this case, we process information such as the prospective customers' personal data (such as name, date of birth, TIN), as well as information about our previous contractual relationship, provided that you have not been deleted (such as contract duration, grant amount, average accounts, and payment history). The prospective subscriber may declare to the employee serving him that he does not wish for the automated processing of his personal data for the above purposes. In this case, the assessment will be carried out at a later stage with a different procedure.
 - b) **In the event that a credit check is not feasible based on the data available on OTE and COSMOTE systems (e.g. because this particular subscriber has never been an OTE / COSMOTE subscriber),** OTE and COSMOTE perform a pre-contractual credit control using the database containing data relating to the economic behavior of customers of mobile communications created by the mobile telephony companies and operated by the company named "TELEGNOUS – TELECOMMUNICATIONS SOLVENCY ASSESSMENT AGENCY – PRIVATE COMPANY" with the distinctive title "TELEGNOUS PRIVATE COMPANY" (hereinafter "TELEGNOUS").

In case you **have outstanding debts due to mobile usage**, COSMOTE reserves the right to disclose your personal data to TELEGNOUS, which has been established by all the mobile electronic communications companies currently operating in the Greek market and maintains a record of customer behavior inconsistencies of the customer-subscribers and acts as a Data Controller for this record. The purpose of this record is

to perform effective pre-contractual credit assessment and to clear the transactions in the mobile telephony sector.

TELEGNOUS has been approved by the Hellenic Data Protection Authority (HDPa), as per its positive Opinion No 1/2015. Further details regarding the conditions of the legal operations of TELEGNOUS are included in the Decision No. 28/2017 of the Hellenic Data Protection Authority (HDPa).

Thus, COSMOTE may transfer the personal data of its subscriber to TELEGNOUS if:

- A) the subscriber has a due arrears for more than ninety (90) days and for an amount equal to or greater than € 200,
- B) the subscriber's connection has been disconnected from the COSMOTE network or transferred to another via a number portability procedure, without the subscriber having settled their accounts.

The personal data that COSMOTE may transfer to TELEGNOUS is the TIN number, ID number or Passport ID number, the subscriber's first and last name, as well as an indication of whether the subscriber belongs to category a or b.

The information that COSMOTE derives from the TELEGNOUS database will in no way be used to exclude the consumer from telecommunication services or portability. Instead, they are used as a supplemental consulting tool in the process of contracting with prospective subscribers to help you choose the right telecommunications product that best suits your personal needs and financial capabilities.

Obviously, every subscriber retains the right of access and the right to object (including correction) in relation to the processing of his personal data by TELEGNOUS. For this purpose you can address your request to Cosmote in the ways described [here](#) or to the company TELEGNOUS (56 Kifissias & Delphi Avenue, Marousi, 15125).

More information on TELEGNOUS and its operation can be found at <http://www.telegnous.gr>.

- vi. Under applicable law and in case of overdue debt, we reserve the right to transfer your personal data to cooperating debt collection companies in accordance with the provisions of Law 3758/2009 or any currently applicable law, **in order to inform you of the existence of overdue debts and to negotiate the time, manner and other terms of repayment, on our behalf.** In this context, we transfer Simple Personal Data to the aforementioned debt collection companies and to cooperating law firms. To this end, we cooperate with the companies E-VALUE INFORMATION debtors LIMITED LIABILITY COMPANY, PALADINO Management SA TRADE RECEIVABLES AND SERVICE CUSTOMER SERVICE, FIRST CALL SA UPDATE debtors FOR LIXIPROTHESMES REQUIREMENTS, EOS MATRIX (EOS Matrix) SA UPDATE debtors FOR LATE REQUIREMENTS AND CYCLE CIRCUIT REPORTING COMPANY FOR LATE REQUIREMENTS. OTE and COSMOTE reserve the right to modify this list, by posting the updated list in this Policy. Moreover, we reserve the right to transfer your personal

information to cooperating **law firms** in order to settle claims or settle disputes between us. Lawyers and / or offices may, cooperating with us and within their mandate, seek an amicable settlement of the dispute between us prior to any possible recourse to the courts by calling the contact phone number, we provide them with, or via mail, by using the available contact details e.g. telephones, e-mail, fax etc.

- vii. Following the expiration of our contract for any reason and the settlement of any outstanding dispute (e.g. overdue accounts) and following the expiration of the period that your personal data can be stored according to the applicable regulatory framework, OTE and COSMOTE retain the number of your connection (fixed or mobile) without any other information about you in order to identify you as our former customer in case of any future communication aimed for you to return to our network.
- viii. In cases of major natural disasters (e.g. fires, floods, earthquakes, etc.) and in order to meet the increased needs of our subscribers in emergencies or in case of unavailability issues in our mobile network we may process Contract Data and limited Location Data to determine which subscribers are in the area of natural disaster or were affected by the issue, in order to provide them with emergency benefits, such as free talk time or free MB. The purpose of these emergency services is to cover the increased need of our subscribers for telecommunication services, which has arisen either due to the natural disaster or due to the unavailability of our network for a certain period of time.
- ix. In addition, we process Contract Data and Billing Data in order to execute the cooperation contracts with our retail network and the return of the agreed commission to our partners.

These specific types of processing based on our legitimate interest are of particular importance to us and the development of our products and services, but also to your own protection and your interest as a consumer. **However, you may at any time object to one or more processing activities, based on the legitimate interest (categories i-vix). In order to exercise your right to object, please see [here](#).**

(D). We process your personal data for compliance purposes with our legal obligations.

i) OTE and COSMOTE may process your data in order to transfer it to the competent police or prosecuting / judicial or supervisory Authorities, solely for the purpose of complying with their legal obligations, after receiving a relevant legal request and in order to comply with the applicable legislation.

ii) In addition, OTE and COSMOTE, in the context of complying with the current regulatory framework, are obliged to have in their organizational structure an Internal Audit Unit and a Compliance Unit, which might process the personal data of OTE and COSMOTE subscribers as part of their responsibilities.

iii) In the context of complying with article 3.2 par. n of the Decision no. 991/4/31-5-2021 “Regulation on General Authorization” of the Hellenic Telecommunications and Post

Commission (EETT), OTE and COSMOTE or their partners process Simple Personal Data in order to contact you via email or sms or even by phone, in order to inform you about the imminent expiration of your contract, which may result in changes to your billing or in order to suggest the best current rateplan for the services you receive from OTE and COSMOTE.

(E) We process your personal data for the purpose of safeguarding your own interests or those of other natural persons.

We process personal data in order to provide information to the emergency response authorities, to respond to calls to emergency numbers, including the single European Emergency Number 112, and to locate the caller and provide the emergency services with the caller location information (Location and Traffic Data).

(F) We further process your personal data in order to continuously improve our services and the customer service.

OTE and COSMOTE seek to continuously improve the services provided to you and to provide a high level of customer service. For this purpose, we further process Simple Personal Data, in order to draw useful statistical conclusions on the use of our services and the level of customer service e.g. request service times, call center waiting times, etc.

We, also, formulate the Customer Experience Index based on the combined processing of Service Data and Contract Data, to help up evaluate the level of customer service and the quality of the telecommunication services we provide, so as to expedite the immediate remedial actions of the problem that you may mention and to identify the points that need improvements in our internal processes.

(G) We further process your data in order to draw useful statistical conclusions for us in order to continuously improve our network, after anonymizing them first.

OTE and COSMOTE apply anonymization techniques in Traffic and Location Data in order to analyze and draw useful statistical conclusions regarding the operation and the design of our network. For example, depending on the use of voice services and / or data services performed by subscribers served by specific base stations, in conjunction with demographic data such as age, the network upgrade design is optimized to better meet the needs of the subscribers. Anonymization is the application of techniques on personal data so that it is no longer possible to identify your identity from this information.

4. How will we contact you for promotional purposes?

OTE and COSMOTE send personalized promotional messages based on your individual OTE / COSMOTE subscriber / user service profile, which derives from the processing of personal data **based on your consent see paragraph 3B above** or promotional messages for similar products and services to the ones you already own at OTE and / or COSMOTE, after processing a limited range of your personal data **based on our legitimate interest, and as described in the paragraph 3C**. In the second case, the promotional messages are sent based on the provisions of article 11 of L. 3471/2006, and they are only being sent **provided that you have not exercised the right to object to the sending of such messages during the**

conclusion of the contract between us or upon the receipt of the message (e.g. via the unsubscribe mechanism).

In addition, in case you do not wish to receive such messages from us, [see here](#).

You may receive promotional messages in the following ways:

- Via sms to the mobile telephony connection maintained at COSMOTE or to the contact mobile phone that you have declared for the fixed telephony or internet connection
- Via email, to the email address you provided to us (e.g. when concluding the contract or activating the online account)
- In other similar ways (e.g. via push notifications)

In addition, we will promote our products and services to you by phone. In any case, if you do not wish us to call you for promotional purposes, **you may register in the Registry of article 11 of L. 3471/2006**, which is kept by both OTE and COSMOTE.

More information about the Registry, as well as how to register and deregister from it, can be found [here](#).

5. Who will process your personal data?

Apart from us, your personal data may also be processed by our business partners or third parties. However, we, OTE and COSMOTE, remain solely responsible for the security of your personal data, taking all necessary measures:

- Our business partners are always selected based on the high technological and organizational level of security they offer.
- Before cooperating with any company, especially if our cooperation involves the processing of your personal data, we contractually commit them to ensuring a high level of protection of your personal data.

We process your data mainly within Greece and the European Union (EU). If we cooperate with companies outside the EU, they will only process your data following our request and provided they possess a European Commission's competence decision or if appropriate clauses ensuring a high level of security with regard to processing your personal data exist

We, OTE and COSMOTE, work mainly with companies active in advertising and marketing, market research, IT, consulting, customer service and call center printing, mobile and fixed telephony fee billing and human resource management (HR) services.

Other recipients of your data, in order to promote, support and serve our business relationship, may be OTE's and COSMOTE's trading partners, which mediate the conclusion of the Agreement, the Financial Institutions through which the accounts of each Partner are paid as well as other telecommunications providers in the context of OTE and COSMOTE's interconnection with them for the provision of electronic communications services, for the purpose of billing or troubleshooting.

6. How long will we keep our personal information?

Your personal data are kept for as long as it is necessary to serve the purpose for which they were collected, or for as long as required by the applicable law. With the expiration of the retention period, your personal data will be deleted in a way that it is not technically possible to recover them or they will be anonymized.

Particularly:

- Contract Data, Equipment Data and Service Data are kept for as long as you are an active subscriber to the OTE / COSMOTE network. After the expiration or termination of contract for any reason with OTE and / or COSMOTE, and provided that there are no overdue debts or credit balance or pending complaints on your part, your personal data is kept for a period of fourteen (14) months from the termination or expiration of the contract according to the relevant provision in the current legislation (Decision No. 991/4 of the Hellenic Telecommunications and Post Commission (EETT) "Regulation on General Authorization", Government Gazette B' 2265/31-5-2021) of for 5 years, if you have given your consent for this further retention.

After the expiration of the Contract Data retention period and their final deletion, we only retain your fixed or mobile telephony connection in order to identify our previous contractual relationship in case you wish to return to our network.

- The Billing Data of the subscribers for as long as you are an OTE or COSMOTE subscriber and for additional 12 years from the expiration or termination of the contract for any reason. This period of 12 years is calculated from the date of repayment of any debt owed to OTE and / or COSMOTE or return of any credit balance to you.
- The recorded calls are kept for one year, while the recorded instructions, which you give during your communication through the IVR system (Interactive Voice Response), are kept in the form of voice to text for 1 year as well.
- The Traffic Data of the subscribers of the contract are kept for the purpose of billing the calls for one year, while those of the subscribers of prepaid mobile telephony for three months. They may also be retained for other purposes after the expiration of your contract, e.g. in case of your debt or your complaint in relation to the provision or billing of our services, the Traffic Data will be kept until the final resolution of our dispute.
- Traffic and Location data are also retained for up to three months for troublesome management and request service for the quality of our network and services.

7. What are the measures we take to protect your data?

At OTE and COSMOTE we provide the appropriate technical and organizational measures in our business processes and apply them to the IT systems and platforms used to collect, process or use data.

These are, indicatively:

- Measures to prevent unauthorized persons from accessing data processing systems (access control).
- Measures to ensure that data processing systems cannot be used by unauthorized persons (denial of access control).
- Measures to ensure that persons authorized to use data processing systems have access only to the data for which they are authorized, and that personal data may not be accessed, during processing, or use, or after their recording, transmission, copying, modification or deletion by unauthorized persons (data access control).
- Measures to ensure that, during the electronic transmission, or during transfer or recording, personal data cannot be transferred, copied, altered or removed by unauthorized persons during electronic transmission, or during transfer, or recording, and that it can be controlled and controlled by verification the processors to whom personal data has been transferred through data transmission equipment (data transmission control).
- Measures to ensure that it is possible to retrospectively examine and verify whether and by whom personal data were entered, modified or deleted in data processing systems (data entry control).
- Measures to ensure that personal data processed by third parties / contractors are processed only in accordance with our instructions (contractor control).
- Measures to ensure that data collected for different purposes can be processed separately (separation rule).

8. What are your rights regarding your personal data?

The rights that a client may exercise include:

Right of access: You have the right to receive information about your personal data that we process (e.g., the purposes of the processing, the types of data, the recipients to whom it is communicated, the length of time it is retained) and to provide you with copies those.

Right to correct: You have the right to request correction of your data (e.g. address correction, contact information, ID number).

Right of Deletion: You have the right to request deletion of your personal data if it is no longer necessary for the purposes for which it was processed or if you revoked the consent on the basis of which we collected and processed it.

Right to restriction of processing: You have the right to request restriction of processing for a specific purpose.

Right to data portability: You have the right to receive your personal data provided to our company in a structured, commonly used format that is readable (e.g. receiving data in the Cloud).

Right to object to the processing of your personal data in cases where you do not wish to have your personal data processed.

We also inform you that OTE and COSMOTE have designated a Data Privacy Officer (DPO) in accordance with the provisions of applicable law. In order to contact the Data Protection Officer, you may send an e-mail to customerprivacy@cosmote.gr.

To exercise your right, you can:

- Send an e-mail to customerprivacy@cosmote.gr, or
- Fax to 2102511888 or
- Send a letter to COSMOTE Customer Service, Postal Address: 99 Kifissias Av., 15124 Maroussi on “Exercising personal data rights” with a copy of your identity and by mentioning your name and mobile or landline number.

In case you consider that we have not satisfied your request sufficiently you have the right to file a complaint through a [special web portal](#) to the Hellenic Data Protection Authority (www.dpa.gr) Athens, 1-3, Kifissias Ave., 11523 : Call Center: +30 210 6475600, Fax: +30 210 6475628. Detailed complaint instructions are provided on the Authority's website.

OTE and COSMOTE will respond to your requests gratis without delay within one month of receiving the request. In exceptional cases, this period may be extended by two (2) months if required due to the complexity of your request. In any event we will inform you of this extension and the reason for the delay.

If we consider that your request is manifestly unfounded or excessive, we reserve the right to request a reasonable fee for its satisfaction, taking into account administrative costs for its execution, or even refuse to respond to your request.

This Policy is updated when necessary. If there are significant changes in our Policy we will modify the relevant text accordingly before these changes take effect and we will make every effort to inform you by any appropriate means.

*We encourage you to read this Data Privacy Policy from time to time to stay informed about the processing of your personal data by OTE and COSMOTE. This Data Privacy Policy was last modified on **14/10/2021**.*