

General Information on the Processing of your Personal Data by the companies OTE SA and COSMOTE SA (Data Privacy Notice)

Protecting your data is a **priority for us**. We, at OTE and COSMOTE fully understand how important the protection of your personal data is. This text concerns both **subscribers** and **users** of fixed, mobile telephony and internet access services, as well as those who use the **our mobile** network as roamers . It also concerns **subscribers** of other telecommunication providers, who receive calls from OTE/COSMOTE subscribers. That is why we take all the necessary measures for the security and proper management of your data.

1. What personal data do we process?

Personal data means any information that concerns you and through which we can identify you. This identification can be done either by using specific information or through a possible combination of information that we have at our disposal.

OTE and COSMOTE as providers of electronic communications services process the following categories of personal data for the purposes described in Section 3 herein:

1.1 Simple Personal Data

1.1.1 Data resulting from pre-contractually or 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 registration number (AFM), establishment and / or shipping address, type of rateplan, date of birth, occupation , nationality, contact details (phone, email), telephone number, that you activate in the network of OTE or COSMOTE, AMKA, date of conclusion of the contract between us, username and password for the connection to the internet access service.

It is noted that in the case of special tariff plans (eg dedicated programs for people with disabilities), we process special categories of personal data to a very limited extent (eg certificate of disability), in order to conclude the relevant contract.

For the data we process for the performance of pre -contractual credit assessment, you may find more information in Section "3.3.5 *For the performance of pre -contractual credit assesement, in order to safeguard our legitimate business interests, prevent telecommunications fraud and safeguard the interests of of our customers*".

1.1.2 Terminal equipment data (hereinafter Equipment Data),

used for your connection to the OTE or COSMOTE network , such as the IMEI number of the mobile device or devices that you have activated in our network, the SIM card number , the serial number, the IP address and the MAC Router Address .

1.1.3 Information about your account, payment and / or prepaid renewals (hereinafter Invoicing Data),

such as billing and / or airtime renewal, date and amount of payment, method of payment (eg

in-store payment or payment via My COSMOTE application, by credit card, standing order), credit card details to which pseudonymization techniques are applied , IBAN.

1.1.4 Data concerning the communications between us (Customer Care Data),

such as your history of communications with OTE and / or COSMOTE and in particular your recorded conversation with the Customer Care Department for the purpose of providing evidence of a commercial transaction or of any other business communication, the recorded instructions you gave to the IVR (Interactive Voice Response), which is kept in text format (voice to text), your requests / complaints to Customer Care or in a store or in any other way you contacted us (eg via e - mail , chat , corporate seller), time and manner of resolving your complaints, malfunctions you have notified us about and their recovery time.

1.1.5 Usage Data of Telephone Services (hereinafter Usage Data)

Data concerning the overall use of telephone services, e.g. aggregate data as depicted in the **invoice**.

1.1.6 Promotional Data,

such as information about the offers you have received (eg date / time of SMS or telephone communication), information about your response to them.

1.1.7 Data related to your participation in surveys (Survey Data),

such as information about the surveys you have received / participated in, your responses to the surveys.

1.1.8 Data related to gifts / benefits (Benefit Data),

such as information about the gifts given to you, the relevant communications you received, the date / time you activated it, MSISDN of the recipient of the gift.

1.2 Communication Data

Communication Data includes:

1.2.1 Traffic Data Traffic Data means any data processed for the purpose of transmitting a communication to an electronic communications network or its billing. Traffic data may include, but not limited to, the number, address, login or terminal identity of the subscriber or user, location data, passwords, start and end date and time, and duration of the communication, the volume of the transmitted data, as well as information on the protocol, the formatting, the routing of the communication, the network from which the communication originates or to which it ends. Traffic Data that we process also include data of subscribers of other networks which receive calls from OTE / COSMOTE subscribers (their telephone number- MSISDN or ISDN), , as well as data of subscribers of foreign networks (roamers).

The traffic data we process include:

- **For mobile and fixed telephony:**
 - ✓ the date, time and duration of a connection, your telephone number and the telephone number of the person you are calling or send SMS to (whether you are an OTE / COSMOTE subscriber or another network subscriber), the SIM card number (IMSI) (for COSMOTE subscribers and) and the mobile device (IMEI) number from which the call was made or the SMS was sent (COSMOTE subscribers only).
 - ✓ location data (for COSMOTE subscribers and roaming subscribers) which are necessary to ensure that you can use our telephone services at any time and which are necessary for the transfer of communication through our network.
 - ✓ Messages you receive or leave on Voicemail as well as messages (SMS / MMS) that were not delivered to the recipient.
- **For Internet access:**
 - ✓ the date, time and duration of your internet connection (internet session), Username, password and email, which you used to activate your connection (for COSMOTE subscribers), IP address with which you connected, the MAC address and mobile number (IMEI) from which you connected to the Internet (for COSMOTE subscribers).
 - ✓ Information about the websites you visited (urls) that are necessary for your routing to the point of the site you wish to visit.

1.2.2 Location Data (hereinafter Location Data)

Location data means data processed on an electronic communications network or by an electronic communications service and indicating the geographical location of the subscriber's or user's terminal equipment of a publicly available electronic communications service (such as a mobile base station, which served your outgoing call).

1.2.3 Messages you receive or leave in the voicemail

If voicemail service is enabled for your fixed or mobile connection, we will save your message so you can listen to it later.

Processing of Traffic Data and Location Data is regulated by special legislation regarding the processing of personal data in the field of electronic communications (Directive 58/2002), which was incorporated into Greek law by Law 3471/2006, in combination with the General Regulation on Personal Data Protection (GDPR) and N. 4624/2019.

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

2 What is personal data processing?

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The information you trust us will be completely safe, because:

- we retain only the absolutely necessary personal data, depending on the purpose of the processing,
- we process data in a way that guarantees its security and protection from unauthorized or illegal access and processing and accidental loss, destruction or deterioration, utilizing the appropriate technical or organizational measures.

We also want to assure you that OTE and COSMOTE, do not process or store the content of all communication that takes place through our network with the exception of what is provided in Section 6 herein.

Please note that this is the general informative text of OTE and COSMOTE regarding the processing of personal data with regards to the provision of telecommunication services. In case you activate services provided by OTE or COSMOTE **other than fixed telephony and internet and / or mobile telephony services**, please seek more information, provided through more specific informative texts for the processing of your personal data per service [here](#) or on the site of the respective service. The specific terms regarding the processing of your personal data for the provision of a service are interpreted in combination with the present terms.

3 For what purposes do we process your personal data?

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

In order to serve our contractual relationship, we process the data referred to in section "1. **What personal data do we process? "** in order to ensure::

- 3.1.1 the preparation of a contract for the provision of fixed and internet or mobile services with OTE and / or COSMOTE or to submit an application for the purpose of concluding it,**

In order to become our subscriber, we will ask you for the necessary information to conclude the contract, such as name, VAT number, ID number, Address, contact details (phone and / or e-mail). We will also ask for proof of identity such as identity card or passport.

- 3.1.2 the provision of our services and the transmission of your communication through our network or in other networks in case of roaming in a network provider inside or outside the EU.**

For the provision of telecommunication services and the transmission of your communication we process Traffic & Location Data, as mentioned above and we exchange them with other providers to ensure that you can communicate with subscribers of other providers as well as to use our services when you are abroad.

In order to transmit your communication we use the mobile and landline network. Specifically, when text messages are sent from mobile subscribers, either the "traditional" sms (or mms) technology is used, which uses COSMOTE's mobile network, or the RCS (Rich Communication Service) technology, also known as "Message+". RCS is an IP messaging service provided by Deutsche Telekom AG (hereinafter referred to as Deutsche Telekom) based in Bonn, Germany, (Friedrich-Ebert-Allee 140 , 53113) in accordance with the terms of service available [here](#) . Deutsche Telekom is also the controller of your personal data when you send messages via the Message+ service. You can be informed about the processing of your personal data when using the Message+ service [here](#).

3.1.3 your service and identification.

In order to serve your requests through the customer care channels of OTE and COSMOTE (eg call center, store network), we process your data to identify you and to serve your requests. The requests include, among others, information requests, requests for exercising rights, complaints or grievances that we receive through competent authorities (eg EETT, Consumer Ombudsman, Data Protection Authority (DPA), ADAE).

3.1.4 your billing depending on the use of each service, the verification of the billing process and the payment of the provided services.

For the charge of our services we process Contract Data and Traffic Data, in order to configure your invoice. For the payment of the provided services, we process additional information, such as where you paid the bill, as well as Invoicing Data (means of payment, credit / debit card details, in case a card is used and / or the IBAN , in case of payment by standing order).

Also, in order to verify the correct operation of the billing process and to detect possible incorrect charges, we process Traffic Data, Invoicing Data and limited Contract Data, in order to carry out sample checks.

In addition, SMS messages originating from abroad networks are processed, in order to achieve their correct billing and payment of interconnections, as well as to protect the network from massively sent SMS messages, originating from dangerous destinations.

3.1.5 The fault management of our network and our information systems

COSMOTE and OTE collect and process **Traffic Data (which includes location data)** of subscribers and users and Contract Data, in order to provide effective fault management . The Traffic Data we process for fault management purposes also include data of subscribers of other networks (mainly their phone number), which received call(s) by OTE / COSMOTE subscribers, as well as data of foreign subscribers, which use our mobile network as roamers. Data are utilized:

- to perform preventive actions to our network, in order to ensure the smooth operation of the services provided.

- to deal with a specific problem of our network, which is reported by you and may relate to the coverage or quality of the network such as call interruption, poor call quality, low access speed, frequent disconnections from the Internet, etc. In these cases we refer to your Data , in order to identify if this is a generalized problem in a specific area or if it only concerns your connection, in order to deal with the problem as efficiently and as quickly as possible.
- to resolve problems in the operation of our information systems, which are necessary for the provision of our services and their billing, such as for example the fault management of billing systems.

3.1.6 Communicating with you and informing you about issues related to your contract.

In order to inform you about issues related to your contract, such as e.g. to inform you about your current bill or for requests you have submitted, we contact you via email, sms , post or even by phone.

3.2 We process your personal data based on your consent.

OTE and COSMOTE process your personal data based on another processing basis, such as your consent.

The two companies combinatory, based on your consent, will process your personal data derived from the services provided to you, in order to create your personal profile based on your personal preferences.

Creating a profile is a form of automated processing of your personal data, through which we can evaluate some of your preferences, such as predict products that may interest you and send you relevant updates / ads that meet your interests.

Read the text with which the relevant consent is provided [here](#).

Additionally, in the course of our lawful business practice in order to provide evidence of a commercial transaction or other communication of a professional nature (eg for ordering products, services, as well as for subscriber requests and subscriber billing issues), after we provide you with all relevant information, we record our telephone conversations.

3.3 We process your personal data based on the legitimate interest of OTE and COSMOTE or our subscribers

OTE and COSMOTE process your personal data based on **our legitimate interests**, taking into account your rights and interests as a consumer. The specific types of processing based on our legitimate interest, are carried out after careful weighing of our legitimate interest in relation to the need to protect your personal data and are limited to the absolutely expected and necessary processing, which is compatible with our relation. These types of processing are analyzed as follows:

3.3.1 For the direct promotion of similar products and services.

We process a limited range of your personal data and specifically Contract Data, Usage Data, Billing Data, Customer Care Data, Terminal Equipment Data and Promotional Data for the direct promotion of similar products and services. This processing **is limited** and aims solely at the submission of proposals and offers concerning the promotion of products and services similar to those you already have and are tailored to your needs. Examples of such messages are messages for offers in our store network, contract renewals and pre-paid cards, Internet speed upgrades. Our communication will take place using the contact details that you provided us in your contract or in a transaction.

We further process Customer Care Data, such as queries, complaints, fault reporting, call center downtime, new service requests, fault time or other service malfunctions in order to provide you with free communication packages with airtime and / or GB on your mobile phone, which facilitate your communication and internet access.

Also, in order to offer you reciprocal gifts (eg packages with free airtime and / or GB, discount coupons, etc.) for your loyalty, we process Simple Personal Data, such as the date of activation of your connection. Gifts can be given either automatically and then you receive relevant information (eg via sms or push notification through COSMOTE applications) or you could be informed (eg via sms or push notification through the COSMOTE applications) for the gifts you are entitled to and activate them through the COSMOTE applications.

In addition, after the expiration of the contract for any reason and the settlement of any pending issues between us (eg payment of overdue bills) and after the expiration of the data retention period provided by the current regulatory framework, OTE and COSMOTE retain **your connection number** (fixed or mobile) without any other information about you in order to identify you as our former customer in case we wish to contact you, in order to promote your return to our network.

3.3.2 To ask you to participate to our customer satisfaction surveys or product/customer care evaluation surveys

We process a limited range of your personal data and in particular Contract Data, Billing Data, Customer Care Data and Equipment Data to ask you to participate to our customer satisfaction surveys or product/customer care evaluation surveys. These surveys are in the form of a questionnaire and can be sent to you via sms or IVR system, through COSMOTE applications, via email, or they could be conducted through outgoing telephone calls. They can also be carried out by an external partner.

In case you choose to participate in a survey, we will analyze your answers and may contact you.

3.3.3 To Control, Manage and Ensure Payment of Unusually High Charges of our subscribers

We process Contract Data, Traffic Data, Usage Data, Billing Data in order to limit your exposure to usage that results in unusually high charges, as well as to ensure their payment.

For this purpose we process personal data related to an unusually high charge of a subscriber. An "abnormally high charge" is determined based on specific criteria, which include the

average of the previous six months' billed traffic and the current billing period's above-average charge rate.

As long as the above charges meet the combination of the relevant criteria, they are included in the daily reports with unusually high subscriber charges. Then, the cases that require control and management are evaluated by a human agent and specific actions are performed such as: (a) sending an informative SMS for unusually (repetitive or not) high charges and a related SMS request for payment of the due amount within five (5) days , otherwise outgoing call barring will be applied, (b) in case of communication with you, information is given about the non-billed usage, while the call is recorded and kept in accordance with article 6 of this Update.

3.3.4 To prevent telecommunications fraud.

We process Contract Data, Traffic Data, Equipment Data and Invoicing Data in order to protect our subscribers and prevent or detect telecommunications fraud.

For these reasons, we create a profile of your telecommunications traffic and make automated decisions to prevent or mitigate fraud.

The automated evaluation of your telecommunications traffic results from the evaluation of indications of unusual telecommunication traffic in combination with your Contract Data, Equipment Data and Invoicing Data. After this assessment is carried out and if there are indications of telecommunications fraud, automated actions are activated, such as temporarily blocking of outgoing calls to high-risk destinations. The above processing constitutes profiling and automated decision-making, which has an impact to our subscribers such as possible adaptation of the service provided (e.g. temporary blocking).

3.3.5 To ensure the security of our network and our information systems.

In order to prevent unauthorized access to our network and information systems and to protect our network and systems against electronic attacks, we perform traffic management actions and process traffic and location data. This is how we prevent illegal and unfair actions on our network and ensure the privacy of your communications. In addition, we maintain logs, which may include traffic and location data of our subscribers for the purpose of monitoring compliance with our policies and ensuring the confidentiality of communications.

3.3.6 For your one-stop service from the companies of our Group (OTE, COSMOTE and GERMANOS).

In the context of the gradual operational integration of OTE and COSMOTE, as well as stores network of GERMANOS, we proceeded to mutual processing of the Contract Data of our subscribers in order to provide the best possible unified service. This means that the companies, together or separately, determine the purposes and manner of processing of your personal data that you have entrusted to us. The purpose of this processing is the uniform treatment and service of the fixed and mobile telephony subscribers by our customer care and stores as well as the promotion of rateplans that best meet your telecommunication needs. In addition to OTE and COSMOTE , our stores (GERMANOS) and the branch network of our partners have access to this information in order to provide you with a unified service.

3.3.7 To conduct a credit risk assessment arising from your contract with us.

OTE and COSMOTE provide services on credit, i.e. based on post-payment cycles and invoicing but also due to the provision of subsidies and the provision of equipment with retention of ownership.

In this context, we wish to protect our legal interest in dealing with reliable subscribers and prevent the creation of overdue debts in the course of our business activity. For this reason:

- **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 (HDP), 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 (HDP).

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.

Information that COSMOTE derives from the TELEGNOUS database is an indication of whether a subscriber has a record in TELEGNOUS database and if he belongs to category a' or b'. This information 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>.

- **We process personal data for the credit assessment of our new and existing subscribers.** The credit assessment takes place during the pre-contractual stage, after the subscriber signs an application for a connection. It also takes place for existing subscribers that request a new service.

When assessing credit risk, we perform credit profiling and automated decision-making. Specifically, we classify each transactional subscriber into credit profile categories, combining information concerning both the subscriber's Demographic Data and information regarding his transactional behavior resulting from the use of mobile and landline telephony services. The categorization takes place in different credit profiles (fixed and mobile telephony) depending on the product-service requested by the respective subscriber.

The prospective subscriber may declare within the connection application form that he does not wish the automated processing of his personal data for the above purposes. In this case, the credit check will be performed at a later stage with a procedure involving a human agent using the abovementioned criteria.

This pre-contractual inspection is carried out as follows:

3.3.7.1 in case you have been an OTE or COSMOTE subscriber in the past:

we process information that we already have in our information systems in an automated way, such as the personal details of the prospective subscriber (name, TIN), as well as information regarding our previous contractual relationship provided that they have not been deleted (such as contract duration, grant amount, average billing details and their payment history).

3.3.7.2 In case the credit check is not possible based on the data available in OTE and COSMOTE systems (eg because the specific prospect subscriber has never been an OTE / COSMOTE subscriber before):

OTE and COSMOTE perform a pre-contractual credit control i) by processing Contract Data (data from your application, as well as information regarding the products and packages you request) and ii) using the database containing data relating to the financial behavior of customers of mobile communications of TELEGNOUS. More information regarding TELEGNOUS file are provided in paragraph 3.3.7.

3.3.8 For the management of overdue debts

3.3.8.1 In order to have a more effective collection of overdue debts from our subscribers and the corresponding reduction of bad debts

OTE and COSMOTE process subscribers' personal data, specifically Contract Data, Invoicing Data and Customer Care Data, in order to inform you about your overdue debt in the following ways: sending an informative sms, email or letter with the aim of reminding of your debt and the ways to repay it or sending a pre-recorded automatic voice notification (IVR) with corresponding content.

3.3.8.2 For the transfer of your data to cooperating debtor information companies, in case of overdue debt. 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,
- EFFECTIVE DIRECT SOLUTIONS (EDS) SA DEBT COLLECTION COMPANY

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.

3.3.9 For the protection of persons and goods in our store network, we install CCTV cameras in appropriate parts of our stores.

Information about the operation of the cameras in our stores can be found [here](#).

3.3.10 To improve the quality of customer care services provided.

In order to ensure a high level of quality in the provided customer care service, a **sample** of the recorded communications with customer care agents is evaluated.

The specific types of processing based on our legitimate interests are very important for the development of our products and services, but also for the protection of your interests as a consumer. **However, you can at any time object to one or more types of processing, which are carried out on the basis of legitimate interest. To exercise the right to object please see [here](#).**

3.4 We process your personal data in order to comply with our legal obligations.

3.4.1 For the transmission of data to the competent authorities

OTE and COSMOTE may process your data, in order to transmit it to the competent police or prosecutor / judicial or supervisory authorities, solely for the fulfillment of their legal obligation, after first receiving a relevant legal request and for the purpose of compliance by of the current legislation.

3.4.2 To comply with the current regulatory framework for corporate governance

In addition, OTE and COSMOTE , in the context of their compliance with the current regulatory framework, are obliged to have in their organizational structure an Internal Audit Unit and a Regulatory Compliance Unit, which within their responsibilities can process personal data of OTE and COSMOTE subscribers .

3.4.3 in order to inform you regarding the termination of your contract, according to the Regulation of General Authorization of the Hellenic Telecommunications and Post Commission (EETT).

In the context of our compliance with article 3.2 par. N of no . 991/4 / 31-5-2021 Decision of EETT "Regulation of General Authorization", OTE and COSMOTE or their associates process Simple Personal Data in order to contact you via email or sms or even by phone in order to inform you about the upcoming termination of your contract, which may lead to changes in your invoice, and suggest you the best current invoice for the services you receive from OTE and COSMOTE .

3.5 We process your personal data for the purpose of safeguarding your own interests or those of other individuals.

3.5.1 To provide information to the competent Emergency Authorities

To provide information to emergency authorities, to respond to calls to emergency numbers, including the single European emergency number 112, and to locate the caller, we provide to the emergency services caller location information (Traffic and Location Data).

3.5.2 To give our subscribers benefits in case of emergency

In case of emergencies, such as major natural disasters, and in order to meet the increased needs of our subscribers, we may process Contract Data and limited Location Data in order to determine which of our subscribers are at the scene of the natural disaster or emergency (eg state of war, terrorist attacks) and offer them benefits such as free airtime or free MB . The purpose of these temporary benefits is to cover the increased telecommunications needs of our subscribers which arose due to the emergency and to facilitate their communication.

3.6 We further process your personal data for the following purposes:

3.6.1 To improve the services provided, the level of service and the promotions.

OTE and COSMOTE seek the continuous improvement of the services provided to you, the provision of a high level of service and the implementation of promotional actions that meet the needs of our subscribers. For this purpose we further process:

- Simple Personal Data, in order to draw conclusions about the use of our services and the level of service. For example, we will process your Contract Data and Customer Care Data in order **to draw statistical conclusions about the average customer response time to our customer requests or the average customer waiting time at our call center.** We will also process Simple Personal Data to draw conclusions regarding the use of our services and offers, in order to improve them and also to design new ones.
- Contract Data and Promotional Data in order to understand **how effective our advertising campaigns are and to improve the design of young people.**
- Customer Care Data and Contract Data, in order to configure the **Customer Experience Index** in order to provide you with the best service . Through the Customer Experience Index we evaluate the level of service we provide and the quality of our telecommunications services in order to launch immediate remedial actions of the problem that you may mention and to identify the points that need improvement in our internal processes.
- Traffic Data and Location Data, in order to analyze and **draw useful statistical conclusions regarding the operation and design of our network after the application of** anonymization techniques. Anonymity is the application of practices to personal information so that it is no longer possible to identify from this information what your identity is.
- Simple Personal Data, to which we have applied mechanisms to hide IDs, **in order to improve our information systems.** In particular, we process limited data in order to control and improve our information systems in case of upgrades or changes.

3.6.2 To promote scientific research, utilizing anonymous data.

OTE and COSMOTE, in the context of their participation in European research programs, disclose to partners anonymous data, including Traffic data or Location Data, in order to draw useful statistical conclusions related to their research.

3.6.3 For the promotion of innovation and the development of innovative products and / or services, utilizing or anonymous data.

OTE and COSMOTE, in the context of their participation in innovation competitions, disclose anonymous data to participants, in order to use them for the development of innovative products and / or services.

The above cases are compatible further processing of the data for the evaluation of which we took into account specific factors, such as: the relationship between initial and further processing purpose, the reasonable expectations of our subscribers, the nature of personal data and the possible consequences of further processing, as well as the measures taken by the controller for data protection.

3.6.4 To improve our internal processes, using anonymous data.

OTE and COSMOTE use anonymous data in order to draw useful conclusions so as to improve our internal processes.

4 How will we contact you for advertising purposes?

OTE and COSMOTE send personalized advertising messages:

- i. **based on your individual profile** of the OTE / COSMOTE subscriber / service user , which results from the processing of your personal data **after your consent see section "3.2 We process your personal data based on your consent."**
- ii. **advertising messages for similar products and services**, with those that you already have after the limited processing of your personal data, **described in section "3.3.1 For the direct commercial promotion of our similar products and services" and takes place based on our legitimate interest.**

In the second case, the advertising messages are sent based on the provisions of article 11 of Law 3471/2006 and specifically are sent provided **that you have not objected to the sending of such messages during the conclusion of the contract between us or upon receipt of the messages (e.g. via unsubscribe mechanism).** In addition, in case you do not wish to receive messages from us, see [here](#).

You can receive promotional messages in the following ways:

- i. via **sms** to your COSMOTE mobile number or to another mobile number that you have provided
- ii. via **email** , to the email address you provided to us (eg when concluding the contract or activating your e-bill).
- iii. in **other similar ways** (eg via push notifications)
- iv. In addition, we promote our products and services to you by **phone** . Of course, **if you do not wish us to call you** for advertising purposes, you should **register your mobile number in the Register of article 11** of Law 3471/2006 (ie Mitroo of Article 11), which is kept by both OTE and COSMOTE. More information about the Registry, as well as how to register or unregister 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, mobile and fixed telephony bill printing services 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 our contract, 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.

With us, it is possible for your personal data and our partners or third parties to process it. However, we, OTE and COSMOTE, remain solely responsible for the security of your personal data, taking all necessary measures:

- Our partners are always selected based on the high technological and organizational level of security they offer.
- Before we cooperate with any company, especially if our cooperation presupposes the processing of your personal data, we bind it contractually, in order to ensure the high level of protection of your personal data.

We process your data mainly within Greece and the European Union (EU). In case we cooperate with companies outside the EU, they will process your data only after our order and in case there is a decision of adequacy of the European Commission, or if the appropriate clauses are agreed that ensure a high level of security in relation to the processing of your personal data.

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

Other recipients of your data, in order to promote, support and service our transaction relationship, may be, the commercial partners of OTE and COSMOTE that mediate the conclusion of the Contract, the Financial Institutions through which the accounts of each are paid. Subscriber as well as other telecommunication providers in the context of the interconnection of the network of OTE and COSMOTE with them for the provision of electronic communications services, for reasons of pricing or troubleshooting.

6 How long will we keep your personal data?

Your personal data is kept for as long as it is necessary to serve the purpose for which they were collected or in cases where the retention period is provided by applicable law, for the period provided by 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.

In case you have given your consent to create a profile and / or to retain the data related to your profile after the expiration of the contract, the retention periods mentioned here apply.

Particularly:

- **Billing Data, Terminal Equipment Data, Benefits Data, Promotional Data and Customer Care Data** (excluding your recorded calls and IVR communications) are retained for as long as you are an active subscriber in the OTE / COSMOTE network. After the termination of your contract with OTE and / or COSMOTE in any way and provided that there are no overdue debts or credit balance, or pending complaints on your part, your personal data is stored in customer service systems for a period fourteen (14) months from the termination or expiration of the contract in accordance with the relevant provision in the current legislation (No. 991/4 Decision of the National Telecommunications and Post Commission (EETT) "General Licensing Regulation", Government Gazette B '2265 / 31- 5-2021).
- **Simple Personal Data related to the invoicing** (Invoicing Data & Limited Contract Data) is kept for an additional 12 years from the termination or expiration of your contract for any reason, in order to comply with tax legislation. The period of 12 years is calculated from the date of repayment of any debt to OTE and / or COSMOTE or return of any credit balance to you.
- **Traffic Data** we process **for the purpose of invoicing calls is kept for one year for contract subscribers and three months for prepaid subscribers** . Also, in case of your debt or your complaint regarding the provision or invoicing of our services, the Traffic Data will be kept until the final resolution of our dispute. Traffic Data (SMS) originating from abroad networks that we process for the purpose of correct billing and payment of interconnections as well as protecting the network from the massively sent sms messages, which originate from dangerous destinations, are kept for seven days.
- **Traffic Data and Location Data** that we process for the purpose of **fault management, ensuring the security of our network and information systems and service requests** regarding the quality of our network and services kept for **up to 30 days** . For these purposes, only that subset of Traffic Data that is absolutely necessary for the detection of specific faults or errors is kept.
- **Traffic Data** for telecommunication fault prevention are retained for one (1) month. In case a fraud incident occurs, the relevant data are retained for a period of one (1) year in order to investigate the incident and to be able to exercise our rights.
- **Traffic and Location Data** which we process in order to transmit to the competent Authorities (police and judicial) according to the legislation in force (Law 3917/2011) are retained for a period of twelve (12) months from the date of communication. Data are destroyed at the end of the retention period following an automated process, with the exception of data which had been lawfully accessed by the competent Authorities.

- **Messages you receive or leave on Voicemail** are retained for up to **10 days** .
- **Messages (SMS / MMS)**, which were **not delivered** to the recipient are kept for **3 days** .
- The **recorded calls** are kept for **six months**, while the **recorded instructions that you give during your communication through the IVR system** (Interactive Voice Response), are maintained in voice format to text also **for six months**.
- **Survey data** is retained **for one year** , from the date of your participation in it.
- **Log files** that we keep for the purpose of controlling and checking compliance with the Privacy Policy of Communications in accordance with the Regulation for the Assurance of Confidentiality in Electronic Communications of the HELLENIC AUTHORITY FOR COMMUNICATION SECURITY AND PRIVACY (ADAE) (Decision No. 165/2011 – Official Gazette 2715/B/2011) **are kept for two years**, unless an audit by the competent Authority is in progress, in which case we keep the records in question beyond two years.

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

7 What are the steps 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 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 of the process performers 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 in relation to your personal data?

The rights that a customer can exercise include:

Right of access: You have the right to receive information about your personal data that we process (eg the purposes of processing, the types of data, the recipients to whom they are notified, the period for which they are kept) and to provide you with copies of them.

Right of correction: You have the right to request a correction of your data (eg correction of address, contact details, ID number).

Right to delete: You have the right to request the deletion of your personal data in case they are no longer necessary in relation to the purposes for which they were processed or in case you revoked the consent on the basis of which we collected and processed them.

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

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

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

We would also like to inform you that OTE and COSMOTE have appointed a Data Privacy Officer (DPO) based on the provisions of applicable law. To contact the Data Protection Officer, you can send an e- mail to customerprivacy@cosmote.gr.

To exercise your rights, you can:

- send e - mail to customerprivacy@cosmote.gr or
- letter to COSMOTE Customer Service, 99 Kifissias Ave. , 15124, Maroussi on "Exercise of personal data rights"

stating your name and the connection number of your mobile or landline, but also the address to which you wish to receive the reply.

In case you think that we have not sufficiently satisfied your request and the protection of your personal data is affected in any way, you can submit a complaint through a [special web portal](#) to the Data Protection Authority (Athens, 1-3 Kifissias Avenue , PC 115 23 | tel : +30 210 6475600). Detailed instructions for submitting a complaint are provided on the [website](#) of the Authority.

OTE and COSMOTE will respond to your requests free of charge within one month of receiving the request. In exceptional cases this deadline may be extended for two (2) months if required due to the complexity of your request. In any case, we will inform you about 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 the administrative costs for its execution or even to refuse to follow up on 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 measures.*

This Policy was last modified on 25/10/2023