



**BUREAU
DE
CHANGE**

**Update on
the protection
and processing of
personal data**

In compliance with the applicable legislation on the protection of personal data, the ONEXCHANGE Group is committed, in the appropriate manner, to protect and use the personal data, acquainted in each case by the traders, for the conduct of purchase and sale transactions of foreign exchange at the Group's branches, via telephone exchange ordering services or through the use of the Group's website, as well as the automated collection of personal data during their visit.

In this context, all employees of the ONEXCHANGE Group are obliged to comply with the internal regulations and procedures for the protection of personal data as well as to handle with complete confidentiality and diligence any information that is brought to their attention, in order to ensure the confidentiality of the traders' personal data.

The Legal Base for the processing of personal data

The processing of personal data is recommended for the collection, registration, organisation, structure, storage, amendment, retrieval, search of information, use, transmission, restriction, or deletion of the personal data that have been or will be brought to attention of the ONEXCHANGE Group.

The Greek, Cypriot kai communal legislation allows the processing of personal data provided that there is a legal base for their collection and use. The companies of the ONEXCHANGE Group process personal data based on the legal and regulative obligations of each country they operate. Consequently, we are not based on your consent as the legal base for the process of personal data.

Specifically, ONEXCHANGE S.A., based in Greece, collects and processes personal data that are only necessary for the conduct of foreign exchange transactions as defined in the Bank of Greece Governor's Act 2541/27.2.2004, in the law 3691/2008 on the Prevention and Suppression of Money Laundering and Terrorist Financing, as it applies, since the Meeting 281/17.3.2009 of the Bank of Greece Banking and Credit Matters Committee and the regulative acts resulting from all the above.

In the same manner, ONEXCHANGE LTD, based in Cyprus, is obliged to collect and process personal data as defined in the Bureaux de Change Businesses Directive of 2004 as well as in the law 1880(14)/2007 on the Prevention and Suppression of Money Laundering.

Additionally, the companies of the ONEXCHANGE Group are required to keep a customer file for at least five years from the transaction's date and to dispose archive procedures and systems sufficient enough to immunize the rapid reproduction of information for the identification and the transactions of the customers. Also, they may provide information to the local Supervisor Authority.

The personal data provided:

- are subject to lawful and legitimate processing in a transparent manner in relation to the data subject
- are collected for definite, explicit and legal purposes and shall not be further processed in an irreconcilable manner towards with those purposes
- are appropriate, coherent and restricted to what is necessary for the purposes in which they are processed
- are accurate, and when necessary, are updated, while all the justifiable measures for the immediate deletion or amendment of the inaccurate personal data are taken, in relation to the purposes of the processing
- are maintained in a format that allows the identification of the subject's personal data only for the period of time required for the purposes of the processing of personal data * personal data can be saved for longer periods of time if the personal data are subject to processing only for archive purposes
- are processed in such a way that the appropriate safety of personal data is ensured, including the protection against unauthorised or unlawful processing and accidental loss, destruction or corruption, using appropriate technical or organisational measures.

Which data are collected

The data required to certify the identity of individuals conducting foreign exchange transactions is limited to the following:

1. Full name and father's name
2. ID or Passport number
3. Issuing Authority
4. Date and Place of birth
5. Current residence address
6. Phone number
7. Occupation and current business address
8. Taxpayer Identification Number (TIN)
9. Customer signature

Documents submitted for the verification of data 1 to 4:

- ID card
- Military ID card
- Passport
- Equivalent valid ID card document

Additional documents that may be used for the verification of the data 1 to 4, issued by Public Authorities:

- Driving License
- Residence permit
- Special Identity Card for expatriates
- Foreigner asylum-seeker card
- Special travel document (T.D.V.)

Data 5 to 8 are verified by the following documents:

- Utility company accounts
- Home or business contract

- Tax Administration Act (former income tax return)
- Employer's certificate
- Copy of last payroll
- Residence permit
- Social Insurance document

The certification and verification range of the identity of natural people - and consequently the personal data provided - varies based on the value of the conducted transactions. More specifically:

- in transactions up to €999.99, an Identification card or Passport (or equivalent document) is shown. The notified personal data are not recorded. Additionally, a non-automaticised control of the trader's full name is carried out against lists of restricted measures, politically exposed people, special interest, etc through the information system of the company. Similarly, these searches are not recorded since no identification occurs with existing records.
- in transactions of equal or greater value of €1000.00, the customer authentication is limited to the data 1 to 5, as mentioned above. An Identity card or a Passport or an equivalent document is submitted, which is copied and the customer's previous transaction activity is audited in the company's information system. If there is a previous record, the transaction corresponds to the existing customer's card. Otherwise, a new customer's card is created. An automaticised control against against lists of restricted measures, politically exposed people, special interest, etc through the information system of the company is carried out. These searches are not recorded since no identification occurs with existing records.
- in transactions of equal or greater value of €12000.00 or €15000.00, in the case of one or more transactions that are considered to be related, a full authentication of the trader's identity is carried out, as provided above (data 1 to 9), whereas declared incomes of natural people are verified by the Tax Administration Act submitted or other equivalent documents.

The collection and processing of the above personal data are necessary for the conduct of foreign currency transactions.

In case of foreign exchange order by telephone or the “Click & Collect” service found on the Group's website, the information provided by the customer during the order are limited to :

- Full name
- email
- Phone number

The retention of the above data presupposes the trader's consent, beforehand, which s/he can recall at any time, with the exception of orders of equal or greater value of €1000.00, which eventually will be processed at the branches of the Group and the information provided are subject to the legal base mentioned above for the collection and use of personal data.

In every case, the ONEXCHANGE Group companies collect personal data that are only necessary for the conduct of foreign exchange transactions, while they may process data collected by third parties since these data are necessary for the purposes of the processing. Whenever additional, optional information is sought, you will be informed at that very moment.

The ONEXCHANGE Group may process your personal data , provided that you secure your consent, to inform you about products and services provided which may interest you. In any case, you have the right to object to the specific processing of your personal data regarding the above purpose.

Automatic data collection through access to corporate websites

IP addresses

IP addresses from which visitors appear to come may be recorded for the safety of the information technology and system diagnose. Also, this data can be used in a concentrated form in order to analyse the trends and the website performance.

Google Analytics

The ONEXCHANGE Group uses Google Analytics. Further information on its use is available at <http://www.google.com/analytics/learn/privacy.html>

Cookies, preferences and visitors comments, social media spread

Do not exist.

Notification and transfer of the personal data

The ONEXCHANGE Group does not share personal data with third parties except if it is required by the applicable regulatory, legislative and as a whole prescriptive framework or court decision.

Access to personal data

If you have submitted personal data to the ONEXCHANGE Group, you have the right to access and correct them as well as to object to their processing if we don't have the right or the obligation to use them.

Safety of personal data

The ONEXCHANGE Group applies justifiable safety policies and procedures in order to protect personal data and information against unauthorised loss, misuse, amendment or destruction. People who have access to personal data are obliged to maintain the confidentiality of the data.

Data Protection Officer

The ONEXCHANGE Group has appointed a Data Protection Officer, who assumes responsibility for overseeing any questions raised about this privacy statement. For any clarification or request for the exercise of your legal rights, you can use the following contact details:

Group Companies details:

ONEXCHANGE S.A.

4 Karagiorgi Servias Str., 10562, Athens, Greece

ONEXCHANGE LTD

8 Kennedy Str.,3106, Limassol, Cyprus

Data Protection Officer

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