

## Bank of Cyprus Holdings Public Limited Company

### Registered Shareholder and Depositary Interest Holder Privacy Policy

#### Introduction

We are committed to protecting the information we hold about you. This Privacy Policy describes how, when and why we, Bank of Cyprus Holdings PLC (“**BOCH**” or “**we**”), may use your information if you are a registered shareholder or a depositary interest (“**DI**”) holder, as well as your rights in relation to this information.

This Privacy Policy extends to the share registry services which are carried out by Link Registrars Limited (“**Link Registrars**”) and Link Market Services Trustees Limited (“**Link Market**”) which is the provider of a depositary interest facility, issuer of the DIs (together “**Link**”) on behalf of BOCH. Under the rules of the Irish Companies Act 2014, we have appointed Link Registrars to manage our register of ordinary shares. Link Registrars’ role as Registrar includes keeping an up-to-date record of shares held by shareholders, administration of shareholder payments, registering share transfers, issuing share certificates and supporting other regulatory functions. In addition, we have also appointed Link Market to act as the Depositary to constitute and issue from time to time, upon the terms of the Deed Poll, DIs, each such DI representing a share in BOCH, and to provide certain other services in connection with the DIs on the terms of, and subject to the conditions set out in, the Depositary Agreement. In carrying out registry services, Link processes personal information about you as a shareholder or a DI holder on our behalf.

This Privacy Policy gives you details about:

- what personal information we use in relation to registered shareholders and DI holders, what we use this information for and the legal basis for doing so;
- how we collect, use and share personal information within BOCH, Bank of Cyprus Public Company Limited (“**BoC**”), the Cyprus Stock Exchange (“**CSE**”) and with our business partners;
- your rights in relation to any personal information we hold about you; and
- how to contact us.

If you are also a BoC customer, you should refer to the separate privacy policy here <https://www.bankofcyprus.com.cy/en-gb/contact-us/privacy-notice/> which governs the personal information which BoC collects from you in relation to the BoC products or services you take as a customer.

If you use any of the engagement tools that we make available to shareholders (for example the Link Signal Hub) (“**Online Services**”), you should be aware of the additional privacy notices that relate to the relevant Online Services. This Privacy Policy supplements, but does not override, those notices.

We will amend this Privacy Policy from time to time to keep it up to date with current legal requirements and the way we operate our business. Please regularly check these pages for the latest version of this Privacy Policy.

## What personal information we collect about you

BOCH and BOC will collect and use personal information from CREST and the Central Securities Depository and Central Registry (CSD) of the CSE, where the Register of the Depository Interests Holders representing Shares is kept and when you supply details directly. We also collect your personal information when you register or use any of our Online Services or our website.

Personal information includes the following:

- IVC (Investor Share Code), Securities Account Number for DI holders and Reference Number given to you by us as a BOCH Shareholder or a DI holder;
- personal details for LSE Shareholders (e.g. name), personal details for DI holders (e.g. name, identification information, nationality, tax identification number or other identification information);
- contact details for LSE Shareholders (e.g. mail address), contact details for DI Holders (e.g. phone number, email address, mail and postal address or mobile number);
- details of categories and classes of shares you hold, records of all transactions;
- details about whether you opt to receive your shareholder documents in an alternative format to allow for accessibility;
- information about proxies and votes you cast;
- any personal details that you provide to us through your communications with us (including without limitation any communications in connection with corporate actions, elections, tax details, proxy appointments, representative appointments, exercise of rights or otherwise);
- your bank account details where you have provided these for the purpose of receipt of dividend or any other payments; and
- a record of your attendance at our general meetings and voting.

## What we use your information for and the legal basis for doing so

We must have a legal basis (lawful reason) to process your personal data. The table below sets out what we use your personal data for and our legal basis for doing so.

<b>Registered Shareholders and Depository Interest Holders</b>	
<b>What we use your information for</b>	<b>The legal basis for doing so</b>
To manage your shareholder's and DI holder's interest in BOCH	<ul style="list-style-type: none"><li>■ Where necessary to comply with the law</li><li>■ Where necessary to manage your shareholder and DI holder rights and our obligations to you as a shareholder and a DI holder, in accordance with our Articles of Association and applicable laws</li></ul>

	<ul style="list-style-type: none"> <li>■ It is in our legitimate interests to make sure that the services provided to you as a shareholder and a DI holder are well managed in accordance with applicable laws and regulations</li> </ul>
To check your identity and the validity of documents in order to keep the shareholder and DI holder register up-to-date	<ul style="list-style-type: none"> <li>■ Where necessary to manage your shareholder and DI holder rights and our obligations to you as a shareholder and a DI Holder in accordance with our Articles of Association and applicable laws</li> <li>■ Where necessary to comply with the law</li> <li>■ It is in our legitimate interests to check your identity and the validity of your documents so we can protect our business and comply with applicable law</li> </ul>
To allow you to exercise your rights as a shareholder and a DI holder in accordance with our Articles of Association and applicable laws	<ul style="list-style-type: none"> <li>■ Where necessary to comply with the law</li> <li>■ Where necessary to manage your shareholder and DI holder rights and our obligations to you as a shareholder and a DI holder in accordance with our Articles of Association and applicable laws</li> </ul>
To communicate with you about shareholder and DI holder related information for legal, regulatory and servicing purposes. This includes information on shareholder and DI holder payments, shareholder resolutions, the annual report and accounts, notice of our General Meetings and any other relevant information that relates to your BOCH shareholding	<ul style="list-style-type: none"> <li>■ Where necessary to manage your shareholder and DI holder rights and our obligations to you as a shareholder and a DI holder in accordance with our Articles of Association and applicable laws</li> <li>■ Where necessary to comply with the law</li> </ul>
To operate the electronic voting system	<ul style="list-style-type: none"> <li>■ It is in our legitimate interest to operate an efficient and reliable voting system</li> </ul>
To address any queries or complaints you raise with us as a shareholder and a DI holder	<ul style="list-style-type: none"> <li>■ It is in our legitimate interests to make sure that your queries or complaints are investigated (for example, so that our shareholders and DI holders receive a high standard of service and we can prevent complaints from arising in the future)</li> </ul>
To meet responsibilities we have to our regulators, tax officials, stock exchange, listing authority, law enforcement or otherwise meet our legal responsibilities and to meet any responsibilities we have with any stock exchange, listing authority, central securities depository, clearing system, custodian, depository or nominee of any of the foregoing	<ul style="list-style-type: none"> <li>■ Where necessary to comply with the law</li> </ul>

## **Who we will share your personal information with**

We will keep your information confidential, but we may share it with third parties (who also have to keep it secure and confidential) who work with us to help deliver our services, in order to fulfil our legal obligations or at your request, under the following circumstances:

- third parties who act on BOCH's behalf such as Link Registrars, our Registrar which manages our share register, Link Market which is the Issuer of DIs, Lumi AGM UK Ltd which provides the system for conducting General Meetings, and Fortuitapps Ltd which provides the Shares Registry System;
- stock exchange, such as the Cyprus Stock Exchange and the London Stock Exchange, listing authority, central securities depository and any depository, custodian and nominee of any of the foregoing;
- other members of Bank of Cyprus Group as necessary to operate our business (for example, BOCH does not have its own IT systems and therefore relies on systems operated by Investor Relations of BoC to process your data and provide you with services and we also rely on other members of the Bank of Cyprus Group for internal reporting and where those companies provide services to us);
- other financial institutions who you ask us to deal with;
- any other service providers and agents (including their sub-contractors);
- our advisers (such as lawyers, tax consultants and other professional advisers);
- your advisers (such as lawyers and other professional advisers) who you have authorised to represent you, or any other person you have told us is authorised to give instructions on your behalf (such as under a power of attorney);
- regulators, law enforcement agencies and authorities in connection with their duties;
- any third party after a restructure, sale or acquisition of any Bank of Cyprus Group company, as long as that person uses your information for the same purposes you originally provided it for;
- anyone we transfer or delegate our rights or obligations to, as allowed under terms and conditions of any agreement you have with us (e.g. if we transfer the management of our share register or the Issuer of the DI's to another service provider).

## **Retention of your data**

Personal data will not be retained for longer than necessary for us to achieve the purpose for which we obtained your personal data as set out above, or as required by any laws that apply. For example, BOCH must retain your personal information contained on the shareholder register for as long as BOCH is operational and for a period thereafter to comply with applicable law.

We do keep certain other records after you have sold your shareholding, if we need to do this to meet legal, regulatory, tax or accounting requirements. We are required to retain an accurate record of your dealings with us, so we can respond to any complaints or challenges from you or others which might be raised later.

We will also retain files if we reasonably believe there is a prospect of litigation. We will then either securely delete it or anonymise it so that it cannot be linked back to you. We review our retention periods for personal data on a regular basis.

### **International data transfer**

When we share information with organisations in another jurisdiction, we will ensure they agree to apply equivalent levels of protection for personal data as we do. If this is not possible, for example because we are required by law to disclose information, we will ensure the sharing of that information is lawful. Also, if we transfer your data from within the European Union to a recipient that is not in a jurisdiction that the European Commission regards as having adequate levels of protections for personal data, we will put in place appropriate safeguards (such as contractual commitments), in accordance with applicable legal requirements including the General Data Protection Regulation (“**GDPR**”), to ensure that your data is adequately protected.

### **Your rights**

You have certain rights relating to your personal data. These include the right to:

- ask for a copy of the personal data we hold about you;
- ask us to give you (or a third party chosen by you) an electronic copy of the personal data you have given us;
- ask us to correct personal data we hold;
- restrict how we use your personal data;
- ask us to delete your personal data;
- object to particular ways we are using your personal data; and
- complain to your local data protection authority.

Your ability to exercise these rights will depend on a number of factors, and in some instances we will not be able to agree to your request (for example, if we have a legitimate reason for not doing so or the right doesn't apply to the particular information we hold about you).

If you would like more information on your rights, or want to exercise them, you can do so in the following ways:

- to correct your personal data, if you are a shareholder please contact Link Registrars and if you are a DI holder please contact the Cyprus Stock Exchange or your Operator (Brokerage Firm or Custodian) in the first instance if any personal data relating to your shareholding or DI holding ) is incorrect;
- to change your voting preferences or mailing preferences, please contact Link Registrars in the first instance;
- in all other circumstances, see the ‘How to contact us’ section.

You have legal rights under data protection laws in relation to your personal information. We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information where we know we are dealing with the right individual.

## **How to contact us**

If you would like to contact Link Registrars, you can telephone 00353 1 553 0050 or write to:

Link Registrars Limited

Link Group

Level 2, Block C, Maynooth Business Campus, Maynooth, Co, Kildare, W23 F854, Ireland

If you have any questions about our Privacy Policy or if you would like more information on your rights, or want to exercise them, you can send an email to [company.secretary@bankofcyprus.com](mailto:company.secretary@bankofcyprus.com) or write to:

Company Secretary

Bank of Cyprus Holdings Plc

51 Stassinou Street, Ayia Paraskevi, 2002, Strovolos, Nicosia, Cyprus

If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority in your jurisdiction, the details of which are available at [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

**Last date updated: 28 January 2021**