

## **CALL AND ELECTRONIC COMMUNICATION RECORDING POLICY**

**PIRAEUS BANK**



## CALL AND ELECTRONIC COMMUNICATION RECORDING POLICY

In accordance with the Law 4514/2018 and the Delegated Regulation 2017/565, with the aim to provide investment services and comply with the regulatory framework, the Group uses technological means of recording telephone conversations and electronic communications involving client orders and partners, as well as data exchange with clients, for executing transactions in financial instruments.

The Group is taking all available security measures to record the telephone conversations or electronic communications associated with dealing on own account and with the reception, transmission and execution of client orders. These conversations or communications are recorded even if they don't end up in the execution of such transactions or the provision of the execution of client orders service. Also, the obligation to recording calls, apply to all calls received from and made by the Group as well as domestic calls involving client orders.

Client identification takes place prior to conducting transactions via phone banking and electronic communication.

The Group does not provide the service of reception, transmission and execution of orders by telephone unless it has previously informed the client that the telephone conversation will be recorded.

In application of the above, the Group's Business Units that record client orders on financial instruments which are given by telephone, inform at beginning of a telephone conversation that the conversation is being recorded for the protection of transactions.

A copy of the recording of the conversations and electronic communication with the client is available on request, for a period of five years and, where requested by the competent authority, the relevant files are available for a period of up to seven years. The information that the conversations are being recorded will be presented in the same language used in the provision of investment services to clients.

For the purposes of monitoring compliance with the provisions in force regarding call and electronic communication recording and record-keeping, the Group periodically monitors the records of transactions and client orders subject to these requirements, including relevant conversations.

Records shall be stored in a durable medium, which allows them to be replayed or copied and must be retained in a format that does not allow the original record to be altered or deleted. Records shall be stored in a medium so that they are readily accessible and available to clients on request.

The Group must ensure the quality, accuracy and completeness of all telephone records and electronic communications.

It should be noted that Group employees are not allowed to receive client orders in financial instruments through their mobile phones.

The Group may accept client orders by means of communication other than telephone, electronic banking or physical presence in a branch, provided that the terms and conditions that it applies are met, especially where exceptional circumstances arise and recording a conversation/ communication on devices is not applicable. Such orders may be made on a durable medium, such as mail, fax, e-mail, or documentation of client orders made at meetings. In the case of personal meetings with clients, the competent executives of the Group should keep relevant minutes or notes on a durable medium in accordance with the requirements of the applicable legislation.

The Group shall provide for the education and training of the personnel regarding the above requirements for recording telephone conversations and electronic communications.

The Group oversees and monitors policies and procedures for recording telephone conversations and electronic communications and evaluates periodically their efficiency. If after the evaluation it is considered necessary, alternative or additional measures are adopted. The above alternative or additional measures shall be applied at least when a new means of communication is accepted for use by the Group.

