

PERSONAL DATA PROTECTION NOTICE TO EYDAP S.A. SHAREHOLDERS

1. Introduction

EYDAP S.A., whose registered offices are in Galatsi, Attica at 156 Oropou St.) (hereinafter the **Company**), Tax Reg. No. 094079101, General Electronic Commercial Register No. 121578960000, as duly represented, is bound under the applicable national and European legal framework to respect the privacy of shareholders and to vigilantly ensure the confidentiality and security of their personal data.

2. Purpose of notice - Definitions

The purpose of this document is to provide information about the type of personal data and the manner in which the Company processes personal data about current and former registered shareholders and their representatives, all persons who acquire and/or exercise rights over Company shares and their representatives, and all persons participating in any capacity at the Company's General Meetings (hereinafter **Shareholders**) and about the rights deriving from such processing of data.

3. Data processed and sources from which it is collected

The shares of EYDAP S.A. are registered and listed on the Athens Exchange, are recorded in the files of the Dematerialised Securities System and are subject to the Dematerialised Securities System Operating Regulations (hereinafter the DSS Regulations) as in force from time to time.

The company with the corporate name Hellenic Central Securities Depository S.A. (ATHEXCSD) as administrator of the DSS has an investor account in which the shareholder identification details specified in Article 4 of the DSS Regulations are entered. In all cases specified by law and the DSS Regulations, that data is placed at the disposal of EYDAP via electronic files by Hellenic Central Securities Depository S.A.

Information relating in particular to the Company's shareholder base and share transactions (e.g. transfer transactions) are brought to the attention of EYDAP by Hellenic Central Securities Depository S.A. (in accordance with the DSS Regulation) after the end of settlement of each trading day on the Athens Exchange.

Moreover, the personal data of shareholders is directly provided them in order to handle issues relating to those persons. In all events, the Company considers the personal data held in the Dematerialised Securities System Investor Account to be valid and up-to-date, and shareholders are obliged to notify any change to their particulars.

The data kept in the EYDAP Shareholders' Register is:

Name-surname

Father's Name

Investor's DSS Account No.

Shareholders' Register No.

Particulars of shares and rights they represent

Tax Reg. No.

Tax Office

Address

Tel. No.

Occupation / Activity

Nationality

ID Card / Passport No. (date of issue, issuing authority, country of issue)

4. Grounds for processing personal data and legal basis

The Company collects and processes the personal data of Shareholders for the following purposes:

- Participation in and exercise of rights of shareholders at General Meetings (Statement of beneficiaries holding company shareholders under Article 124 of Law 4548/2018)
- Maintaining the shareholders' register (Article 40 of Law 4548/2018)
- Dividend distribution (dividend beneficiary identification file under Article 29 of the DSS Regulations) and implementation of all EYDAP's contractual obligations to shareholders (Article 6(1)(b) GDPR)
- Implementation of corporate decisions implemented via DSS (e.g. share capital increases – Article 25 of the DSS Regulations)
- Notification to ATHEX of transactions of persons under a reporting obligation (point 4.1.3.8. of the Athens Exchange Rulebook read in conjunction with Article 13(2) of Law 3340/2005).
- OTC transfer of EYDAP shares due to inheritance or bequest (Article 47 of the DSS Regulations).
- Fulfilment of obligations deriving from provisions of tax law and other mandatory provisions (Article 6(1)(c) GDPR).
- Any action necessary to serve the legitimate interests of EYDAP unless the interests or fundamental rights and freedoms of the data subject which require the protection of personal data prevail over those interests. An example is the submission of a detailed shareholders' register when this is required for the Company to participate in development programmes (Article 6(1)(f) GDPR).
- Publication of Company transactions and particulars in the General Electronic Commercial Register, or on the Athens Exchange or EYDAP website, when required by law.
- Responses and clarifications about specific questions or requests addressed to the Company by shareholders.

5. Data retention period

The retention period for the personal data of shareholders in their capacity as shareholders is set as the entire effective term of the Company, in order to protect the Capital Market. The retention period for personal data collected in the context of a provision of law is the time period specified by law or that required to defend EYDAP's legitimate interests (in judicial disputes) or to discharge its contractual obligations.

6. Transmission to third parties

EYDAP may provide access to or transfer the personal data of its shareholders to:

a) Natural and legal persons to whom the Company assigns the performance of specific tasks on its behalf, including service providers such as lawyers, accountants and providers of technical and support services.

In these cases, the processing is carried out under the control of EYDAP and is subject to the same protection policy.

b) Supervisory, auditing, taxation, independent, judicial, public and/or other authorities and bodies in the context of their competences and duties specified by law, for example, the Athens Exchange, the Central Securities Depository, the Hellenic Capital Market Commission, the Deposits and Loans Fund and the General Electronic Commercial Register, when the law or other regulatory decision obliges it to provide access to or transfer that data or when the provision of that data is required to serve its legitimate interests.

7. Shareholder's Rights

a) Right of access, rectification, deletion

Under Articles 15, 16 and 17 GDPR, shareholders can obtain information about personal data relating to them held by the Company and request amendment, correction or deletion where such data is collected directly by EYDAP and not via its interconnection with Hellenic Central Securities Depository S.A. Where the Company has a lawful or reasonable right to refuse to handle the request, that refusal must be specifically and expressly reasoned.

b) Right to restrict processing

In the cases specified in Article 18 GDPR, shareholders are entitled to restrict the further use of their personal data. The Company may store their personal data but is not able to process it further unless such processing is done with their consent or such processing is necessary either to establish, exercise or defend the Company's legal claims or for the purposes of protecting the rights of another person, or on grounds of public interest.

c) Right to object

Shareholders may object at any time on grounds relating to their particular situation to the processing of their personal data, on the basis of Article 6(1)(e) or (f) GDPR. In that case EYDAP shall no longer process personal data unless imperative and lawful grounds for processing are demonstrated which take precedence over the interests, rights and freedoms of shareholders or it is done to establish, exercise or defend legal

claims.

Contact details

Useful contact phone numbers:

A) Particulars of the Controller: EYDAP S.A.

Address: 156 Oropou St.

Tel.: +30-210 214 4201 Fax: +30 - 210 2144159

Email grammateia@eydap.gr

B) Details of the Personal Data Protection Officer (DPO):

Kalliopi Rontou

Tel.: +30- 2107495156 & +30-2107495356

e-mail: dpo@eydap.gr

C) Particulars of the Hellenic Data Protection Authority:: 1- 3 Kifissias Avenue, GR-115 23, Athens

SWITCHBOARD: +30-210 6475600 , Fax: +30- 2106475628

Email contact@dpa.gr

By reading this document, the shareholder takes cognisance of the aforementioned types of processing which is done solely for the purposes cited above and for purposes compatible with them, which is governed by the rules laid down in the General Data Protection Regulation (Reg. (EU) 2016/679) and the recitals thereof and by Law 4624/2019.