



EYDAP SHAREHOLDERS INFORMATION ON PERSONAL DATA PROTECTION

1. Introduction

"EYDAP S.A.", whose registered offices are in Galatsi Attica (156, Oropou Str) (hereinafter referred to as the "Company" or "Processor") with VAT number 094079101, G.E.MI. Number 121578960000, as legally represented, is committed towards its shareholders, under the current national (Law 4624/2019) and European legislative framework (General Data Protection Regulation of the EU 2016/679, hereinafter GDPR), and the legislation in force on personal data protection towards its shareholders, with respect to their privacy and being vigilant in order to ensure the confidentiality and security of their personal data.

2. Purpose of notification – Definitions

The purpose of this document is to provide transparent information on the type of personal data and the way in which the Company processes personal data of its current and former registered shareholders and their representatives, for those who derive and/or exercise rights over the Company's shares and their representatives and for those who participate in any capacity in the General Meetings (hereinafter referred to as the "GM") of the Company (hereinafter all of the above categories of natural persons and, for the sake of brevity, "Shareholders" or "Shareholder") either in person or remotely by videoconference, which is held in accordance with the legal formalities and at the relevant invitation of the Shareholders on a fixed date, but also at any postponed, adjourned or reconvened General Meeting, as well as on the rights arising from the processing of their personal data, as the case may be.

In the context of the present information, EYDAP SA, as the Data Controller and taking into account the current legislative framework on Personal Data Protection, provides specific information to natural persons other than the Shareholders, who will participate in the scheduled remote G.M. of September 06, 2023, such as the Members of the Board of Directors of EYDAP SA, its executives, auditors and other third parties that processes the personal data concerning them, which are collected directly from the subjects for the purposes of legitimate interests pursued by the Company for such processing.

It is noted that, for purposes of understanding, "personal data" is defined as any information relating to an identified or identifiable natural person, i.e. one whose identity can be verified directly or indirectly, in particular by reference to an identifier such as name, identification number, location data.

Processing of personal data means any operation or set of operations, which is performed, whether or not by automated means, on personal data or on sets of personal data, such as collection, recording, organization, structuring, storage, adjustment or alteration, retrieval, search of information, use, disclosure by transmission, dissemination or any other form of disposal, alignment or combination, restriction, deletion or destruction.

"Controller" means the natural or legal person, public authority, service or other body which, alone or jointly with others, determine the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its appointment may be provided for by Union or Member State law, in this case EYDAP SA.

"Processor" means the natural or legal person, public authority, service or other body that processes personal data on behalf of the controller, in this case the Société Anonyme "Greek Central Securities Depository SA" and the distinctive title "ATHEXCSD" with the registration number 094449050, D.O.Y. Athens Tax Office, which has been entrusted by EYDAP SA with the organization of the remote General Meeting, on September 06, 2023.

3. Data subject to processing and collection sources

i. General Information

The shares of EYDAP SA are nominal and listed on the Athens Stock Exchange, are registered in the records of the «Dematerialized Securities System» and are subject to the Regulation on the Operation of the Dematerialized Securities System (hereinafter "DSS Regulation") as in force at the time.

The Société Anonyme under the name "Greek Central Securities Depository SA", (ATHEXCSD) as the administrator of the DSS, maintains an Investor Account, in which the identification data of the shareholder provided for in Article 4 of the DSS Regulation is registered. These data, in each case provided for by the Law and the DSS Regulation, are available to EYDAP SA through electronic files from the "Greek Central Securities Depository SA".

Information relating, in particular, to the Company's shareholder base and its share transactions (e.g. transfer transaction) are brought to the attention of EYDAP SA by the "Greek Central Securities Depository S.A." (pursuant to DSS Regulation) at the end of each trading day at the Athens Stock Exchange.

Therefore, personal data of Shareholders is available directly by them for the purpose of matters concerning them, or by third parties authorized by them to do so, or, as described above, by the Societe Anonyme under the name of " Greek Central Securities Depository S.A.", in its role as manager of the "Dematerialized Securities System".

In any case, the Company considers as valid and updated the personal data held in the Investor's Account of the "Dematerialized Securities System" where the Shareholders must notify any change.

a) The information kept in EYDAP's Shareholder Record Book is:

Full name

Father's name

DSS Investor Share Code

Shareholder Registry Number

Details of the shares and rights held by them

VAT number

Tax office

Address

Phone

Occupation / Activity

Citizenship

ID number/ Passport number (date of issue, issuing authority, country of issue)

- b) Shareholders' correspondence data and e-mail address
- c) Data on the status by virtue of which the Shareholder participates in the General Meeting of the Company and the relevant supporting documents
- d) Data concerning the Shareholder's participation and the exercise of voting right in a General Meeting of the Company, data of various requests submitted to the Company from time to time, Shareholder's signature and generally any other information in the context of the implementation of the legislative framework governing the financial instruments markets.

II. More specific information on the remote conduct of the September 6, 2023 Regular General Meeting:

EYDAP S.A. informs the Shareholders that, for the purposes of their participation in the remote Regular General Meeting on September 06, 2023 or any Repetitive General Meeting, the following information will be collected and processed by the "Greek Central Securities Depository SA" which has been entrusted by EYDAP with the organization of the Remote General Meeting, within the framework of the execution and implementation of a contract, under which they will be provided with the possibility to participate and vote remotely in the General Meeting (hereinafter referred to as "Online Platform").

In order for Shareholders to participate and subsequently vote at the Meeting remotely in real time via videoconference without their physical presence, the creation and use of an electronic account in the AXIA e-SM Online Platform is required. Upon successful completion of the registration, Shareholders may participate in the Meeting by selecting (on the next record date) the *Participation in the General Meeting* button.

By selecting "*I wish to participate in the General Meeting by electronic means*", they receive an email notification to watch the teleconference.

Furthermore, EYDAP informs the Shareholders that, in accordance with article 131 (voting method at the General Meeting) par. 2 of Law 4548/2018, remote voting is open and the exercise of the voting right by the Shareholder and the content of his/her vote, if requested, may be communicated to the other shareholders participating in the General Meeting.

EYDAP informs the Shareholders that the General Meeting will be recorded in order to prepare the minutes of the General Meeting. The recording material is available only at the Board secretariat and only for the purpose of drafting the minutes, and will be safely kept for one year.

EYDAP S.A., further informs that it will also process the following data of natural persons, in addition to the Shareholders, who will participate in the video conference of the remote General Meeting, such as the Members of the Board of Directors of EYDAP, executives of EYDAP, auditors and other third parties, which are collected directly from the data subjects in question, for the purposes of EYDAP legal compliance with the applicable legal framework on one hand and the legitimate interests pursued by EYDAP for such processing, on the other hand and, in particular, for the legal conduct of the remote General Meeting:

- a) Identification data, such as full name, father's name, identity card, passport or other equivalent document.
- (b) Data concerning the status by virtue of which these persons are entitled to participate in the General Meeting.
- c) Email address, mobile phone, for the purpose of the natural person's participation in the conference call.
- d) Audio data in case the participant of the General Meeting takes the floor,
- e) Data relating to the participation and the exercise of voting rights of the Shareholder in the General Meeting, including the data required for the participation in an electronic conference call (e.g. passwords).
- f) Any other data of shareholders and other participants, the processing of which is deemed necessary during the execution of the Service by the processor

4. Purposes of data processing and legal basis

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

- Shareholder Identification
- Participation and exercise of Shareholders' Rights in General Meetings (Statement of Beneficiaries Participation under Article 124 of Law 4548/2018)
- Checking the possibility and legality of the exercise of Shareholders' rights in accordance with the current legislation

- Keeping Book of Shareholders (article 40 of Law 4548/2018)
- Dividend Distribution (Dividend Beneficiaries Identification File under Article 29 of DSS Regulation) and fulfillment of any contractual obligation of EYDAP to Shareholders (Article 6 par. 1 b EGDPR)
- Implementation of corporate transactions executed through DSS (e.g. share capital increase - Rule 25 of DSS Regulation)
- Notification to the Athens Stock Exchange of obligated persons (4.1.3.8. of the Athens Stock Exchange Regulation in conjunction with section 13 par.2 of Law 3340/2005)
- Off-exchange transfer of EYDAP shares due to inheritance or entailment (Article 47 of DSS Regulation)
- Fulfillment of obligations arising from the provisions of tax law and other mandatory legal provisions (Article 6 par. 1 c of EGDPR)
- Any action necessary to serve EYDAP's legitimate interests, unless the interests or fundamental rights and freedoms of the data subject that impose the protection of personal data override those interests. An indicative example is the presentation of a detailed stock listing when required for the participation of the Company in development programs (Article 6 par. 1 par. of EGDPR), the recording for the transcription of the minutes
- Publication of the Company's acts and data on General Commercial Registry, the Athens Stock Exchange or on the EYDAP website, when required by law
- Provision of answers and clarifications to specific questions or requests addressed to the Company by the Shareholders.
- Keeping a historical record of the Company's Shareholders

Therefore, the processing of Shareholders' data is carried out in the context of the relationship between us (Article 6(1)(b) GDPR), the compliance with current law (Article 6(1)(c) GDPR) and, for each action necessary to serve the legitimate interests of EYDAP, unless these interests are overridden by the interests or fundamental rights and freedoms of the data subject that require the protection of personal data.

In exceptional cases where your consent is requested (Article 6(1)(a) GDPR), e.g. taking a photograph, this will only be provided after you have been informed about the specific purpose and the processing will be carried out with your free consent for the specific purpose.

5. Data retention time

The time period during which the shareholders' personal data are retained, within the context of their shareholder status, is determined for the entire duration of the Company, for the purposes of protecting the Hellenic Capital Market Commission. The period of retention of personal data collected under a statutory provision shall be maintained for the time period prescribed by law or for the time period required to defend EYDAP's legal interests (litigation) or fulfill its contractual obligations.

Data necessary for the holding of the remote General Meeting shall be retained by the processor until the service of holding the remote General Meeting has been completed at the appointed or postponed time. The audio recording of the Meeting shall be kept for one (1) year at the secretariat of the EYDAP Board of Directors and shall be deleted after the minutes have been transcribed.

6. Data Receivers - Transmission to Third Parties

EYDAP may provide access to or transmit the personal data of its Shareholders to:

a) Natural and legal entities to whom the Company entrusts the performance of specific tasks on its behalf, indicatively service providers such as lawyers, accountants, and providers of technical and support services, file storage and management companies, postal service providers, e-mail service providers, internet hosting services including cloud services, external consultants and partners of the Company.

b) The Societe Anonyme "Greek Central Securities Depository S.A.", which has been assigned by EYDAP as the processor on behalf of EYDAP, the organization of the remote General Meeting as well as the sub-processor of the company "Greek Central Securities Depository S.A.", Zoom Video Communications Inc. ("Zoom").

In this context, "Zoom" acts as a processing sub-contractor (sub-processor), as it processes on behalf of ATHEXCSD personal data of shareholders and other participants in the General Meeting, which are collected during the conduct of the remote General Meeting, in real time. Data transmitted to "Zoom" is held in-transit and at-rest at "Zoom" facilities located within the European Union. However, for exceptional cases such as the provision of technical support where data may be transferred outside the EEA (Economic European Area), ATHEXCSD, in order to comply with the legality of the processing and in accordance with Chapter V of the GDPR, has considered and ensured the existence of standard contractual clauses (SCCs) for data transfers outside the EEA as well as additional measures taken by "Zoom". The following link provides a list of Zoom's processing sub-contractors who may process personal data on its behalf: <https://explore.zoom.us/en/subprocessors/>

For further information on the Personal Protection Policy Data for each company: <https://axia.athexgroup.gr/terms-of-use#gdp> <https://explore.zoom.us/en/privacy/>

It should be noted that in cases where processing is carried out by entities (natural and/or legal entities) who carry out services on behalf of the Company, they are bound, in addition to the legal framework on the protection of personal data governing their services, by confidentiality clauses and confidentiality of information.

The Company has legally ensured that those who process personal data on its behalf, must provide adequate assurances for the implementation of appropriate technical and organizational measures in such a way that processing complies with the requirements of the GDPR and the current legal and regulatory framework, in order to ensure data protection and privacy of natural entities.

c) Supervisory, audit, tax, independent, judicial, public and / or other authorities and bodies within the framework of their statutory powers and duties. Indicatively, the Athens Stock Exchange, Greek Central Securities Depository S.A., the Hellenic Capital Market Commission, the Central Securities Depository, the Deposits and Loans Fund and the General Registry, when the law or other regulatory act obliges it to provide or transmit such data or when the disclosure is required to serve its legitimate interests.

d) Where applicable and subject to legal requirements, to other Shareholders of the Company. It is specifically mentioned that in case that any transfer of personal data outside the EEA or to international organizations is required, such transfer and processing in general will always be carried out in compliance with the GDPR and the general legal framework on the protection of personal data and, provided that the relevant provisions are met and adequate safeguards are provided for the protection of personal data.

7. Personal data protection and security measures

With a view to safeguarding your privacy, we apply the best practices to secure your personal data through the implementation of the necessary technical and organizational measures defined in the current legal framework. Data is secured against loss of availability, integrity and confidentiality of the information, as well as against unauthorized or illegal processing, accidental loss, destruction or damage, alteration, unauthorized disclosure or access and, in general, against any other form of unlawful processing.

In any case, before your participation in the holding of the remote General Meeting on September 06, 2023, please refer to the terms, conditions and technical details in the Update "Terms and Conditions for the Distance General Meeting 06.09.2023"

8. Shareholders' Rights

a) Right of access, correction, deletion

Pursuant to Articles 15, 16 and 17 of the GDPR, Shareholders may be informed of their personal data held by the Company and may request modification, correction or deletion if those are collected directly by EYDAP and not through an interface with the “Greek Central Securities Depository S.A.”. In the case of legal or reasonable right of the Company to refuse to process the claim, this (the refusal) will be specifically and explicitly justified.

b) Right to limit processing

In the cases provided for in Article 18 of the EGDPR, Shareholders have the right to restrict the further use of their personal data. The Company will be able to store their personal data but will not be able to process it further unless such processing is with their consent or if it is necessary for either the foundation, exercise or defense of legitimate claims of the Company either the protection of another person's rights either for reasons of public interest

c) The right to object

Shareholders may object at any time and for reasons related to their particular situation in the processing of their personal data, based on Article 6 par. 1 (e) or (f) of the EGDPR. In such case, EYDAP shall no longer process personal data unless it demonstrates imperative and legal reasons for processing that override the interests, rights, and freedoms of shareholders or for the foundation, exercise or support of legal claims. It should be noted that where a decision is taken solely on the basis of automated processing, including profiling, if it produces legal effects concerning or significantly affecting the data subject in a similar way, the data subject has the right to object, unless there are specific grounds in accordance with applicable law (Article 22 GDPR).

d) Right to the portability of personal data

Shareholders have the right to receive the data concerning them that they have provided to EYDAP in a structured, commonly used and machine-readable format or to request the transmission of such data to any other processor, provided that the processing is based on consent and is carried out by automated means and without prejudice to EYDAP's legal rights and obligations for data retention (Article 20 GDPR).

e) Right to withdraw your already given consent (art. 7 GDPR)

i.e. to withdraw your consent at any time for consent-based processing. The legality of the processing of your data is not affected by the withdrawal of consent until the point in which you requested the withdrawal.

f) Right to complaint to the DPA, the right to appeal to the competent supervisory authority, the Data Protection Authority (1-3 Kifissias Street, Athens, P.C. 115 23, +30 210 6475600, contact@dpa.gr), if you consider that your rights are infringed in any way and that your data are processed in violation of the current legislation.

You have every right to exercise your rights by completing the relevant Rights Exercise Form and sending it by email to dpo@eydap.gr or by letter to 9 Ilision 9, Athens 157 71.

Mrs Marianna Alboura, Data Protection Officer (DPO), is competent to answer, resolve and clarify any questions you may have. Please submit your requests in accordance with the clear instructions set out in the Rights Exercise Form, which is provided on EYDAP website and must be accompanied by the appropriate proof of personal identification, with the express reservation of EYDAP SA to request additional information for the purpose of identifying and confirming your details.

The Company reserves the right, after studying your request, to proceed, within a period of one month or more in case of justified delay, to satisfy it, provided that it is legitimate and justified. Before we provide you with personal data, we may ask you for proof of your identity and adequate information about your transactions with us from which we can identify your personal data.

If you decide to unsubscribe from a service or communication, we will try to delete your data as soon as possible, although we may need some time and/or information before we can process your request. The Company reserves its rights to retain your personal data in those cases where there is a legal obligation on it or exercise of legal claims or fulfillment of its obligations in the context of the relationship between us.

9. Policy update

EYDAP unilaterally reserves the right to update, modify or revise this Policy in order to improve its services, to harmonize it with the provisions of the current legislation (internal and EU) on the protection of personal data.

To this end, please check this Privacy Policy and Privacy Statement, regularly in order to be informed of the changes that have been made, on the website www.eydap.gr

10. Contact info

a) Data Processing Manager:

EYDAP SA

Address: 156, Oropou Str.

Phone number: + 30-210 214 4201 Fax: + 30-210 214 4159

Email: grammateia@eydap.gr

b) Data Protection Officer (DPO):

Marianna Alboura

Phone number: + 30- 210 749 5155 & + 30-210 749 556

E-mail: dpo@eydap.gr

c) Personal Data Protection Authority (DPA):

Address: 1-3, Kifisias str., 11523, Athens

Tel.: +30 210 6475600 – Fax: +30 210 6475628

e-mail: contact@dpa.gr

Disclosure Statement

By reading this, the shareholder is aware of the aforementioned treatment in accordance with Regulation 2016/679 and its recitals, solely for the purposes stated above and for purposes consistent with them.

Last update: 29.08.2023