



ATHEX
Athens Stock Exchange

Information on the processing of
personal data of participants
(other than shareholders) to the
Remote General Meetings of the
Company

HELLENIC EXCHANGES
– ATHENS STOCK EXCHANGE S.A.

A. PROVISION OF INFORMATION TO DATA SUBJECTS

“HELLENIC EXCHANGES – ATHENS STOCK EXCHANGE S.A.” (hereinafter referred to as “ATHEX”), in its capacity as the controller of personal data in the context and in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as “General Data Protection Regulation” or “GDPR”), the Law 4624/2019 and in general according to currently applicable legislation in force with regard to the protection of personal data, shall hereby provide the following information on the processing of the personal data of the natural persons, other than the persons who are or were registered shareholders of ATHEX (hereinafter referred to as “Shareholders”), which participate under any capacity in the Extraordinary and Ordinary General Meetings via teleconference and in any adjourned, postponed, suspended or repeated General Meetings. These natural persons may be the legal representatives or representatives of these shareholders, and anyone who has the right to vote and generally draws and/or exercises the right to vote representing legal entities, as well as those who participate under any capacity to the Extraordinary and Ordinary General Meetings of shareholders that will take place remotely by teleconference, as well as any repeat meeting thereof (e.g. members of the Board of Directors, executives of ATHEX, auditors and other third parties). Hereinafter, for the purposes of the present, all the above categories of natural persons will be jointly referred to as “Natural Persons” and each of them as “Natural Person”).

It is noted that processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

ATHEX, as the issuer of the shares, legally processes the personal data of the Natural Persons participating in the General Meetings, under the aforementioned capacities, always for legitimate and fair purposes, following the principles of the fair and transparent processing, applying the appropriate technical and organizational measures, in compliance with the requirements of the GDPR as well as the current legal framework, always having as a guide and primary concern the safeguarding and protection of personal data and the fundamental rights of data subjects.

Following the above, ATHEX, in compliance with the principle of transparency, informs Natural Persons participating in the General Meetings with the present document about the terms of processing of personal data concerning them.

I. The kind of data we collect (personal data categories)

The personal data of the Natural Persons which are collected and processed by ATHEX in the context of their participation in the General Meetings are the most necessary, adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Indicatively the main categories of personal data that are processed are the following:

- a) Identification data, such as: name and surname, father's name, identity card number or other equivalent document, passport data, tax identification number, profession, citizenship, and other demographic data.
- b) Contact information such as: postal and e-mail address, fixed and/or mobile telephone number, etc.
- c) Data relating to the capacity under which the Natural Person participates in the General Meeting and the relevant supporting documentation.
- d) Correspondence and number and class of shares in case the Natural Person is a representative of a Shareholder.
- e) Data relating to the participation and the exercise of the voting right of the Natural Person in the General Meeting of ATHEX, including the data required to participate in an electronic teleconference (e.g. access codes).
- f) Audio data (audio recording) in case the Natural Person takes the floor during the General Meeting.

II. Where we collect your data from (sources of personal data)

The aforementioned personal data are collected directly from the Natural Persons participating in the General Meetings.

ATHEX hereby notifies the Natural Persons that, for reasons of participation in the remote General Meeting of ATHEX, or any repeat meeting thereof, their codes of process in the online platform <https://axia.athexgroup.gr/>, through which they will have the possibility to participate and vote remotely in the General Meeting (hereinafter referred to as the "Online Platform") will be collected and processed by the processor ("Hellenic Central Securities Depository S.A."), to which ATHEX has assigned the organization of any remote General Meeting.

III. Why we collect your data and how we process (purpose and legal basis for processing)

ATHEX collects the personal data of the Natural Persons that will participate in the General Meeting, as above mentioned, and in general processes them, for the fulfillment of legitimate purposes of processing and always according to valid legal basis which establish the lawfulness of the processing.

Specifically, ATHEX processes the personal data of Natural Persons for the provision of access to an online platform for electronic teleconferences (Axia e-Shareholders' Meeting) and for their participation in the General Meeting and specifically:

- a) To identify the Natural Person.
- b) To communicate with the Natural Person.
- c) To verify the possibility and legality of exercising Shareholders' representatives and agents rights, according to law (indicatively exercise of the right of participation and voting right in the General Meeting, keeping minutes of the General Meeting, etc.).
- d) To submit copies of the minutes of the meetings of ATHEX General Meeting to the General Commercial Register (G.E.M.I.),
- e) To fulfil and support legal rights, as well as for the defense and service of ATHEX's legitimate interests (such as in the context of legal claims of ATHEX).

For the above-mentioned processing purposes, the following legal basis for processing applies:

The legal basis for the processing carried out in order to achieve the above purposes a) and b), is to protect the legitimate interests of the Company, which are to provide access to the Online Platform to all participants of the General Meeting and to ensure the proper conduction of the General Meeting.

The legal basis for the processing carried out in order to achieve the above purposes c) and d) is the fact that the processing is necessary for the compliance of ATHEX with its legal obligations under the current legal framework for public limited companies and the transparency requirements for information on issuers whose securities have been admitted to trading on a regulated market (indicatively Articles 40,123,124,125 and 134 of Law 4548/2018).

For the processing carried out in pursuit of the above purpose e), the legal basis is the fact that processing is necessary to safeguard the legitimate interests of the Company, which consist in particular in providing the required information and settling issues raised by the Natural Persons participating in the General Meeting, ensuring the smooth and orderly continuation of its operation and activities, defending its legal claims and rights, as well as protecting its property.

IV. Who are the recipients of personal data?

Access to the personal data of the Natural Persons shall be awarded only to ATHEX' s employees and Executives, within the range of their responsibilities and in the exercise of the duties assigned to them.

ATHEX shall not transmit or disclose personal data except to:

- a) Natural persons and legal entities, to which ATHEX assigns the execution of certain tasks on its behalf, such as, inter alia, database management companies, file storage and recordkeeping companies, postal services providers, providers of services related to the development, maintenance and customization of IT applications, e-mail services providers, companies providing webhosting services (including cloud services) lawyers, law firms, chartered accountants or audit firms.
- b) The société anonyme "Hellenic Central Securities Depository S.A.", which has been assigned by ATHEX, as the processor on behalf of ATHEX, with the organization of the remote General Meeting and the

sub-processor (further processor) of the société anonyme "Hellenic Central Securities Depository S.A.", ZOOM Video Communications Inc., which provides the group of tools/services Zoom Meetings that provides the possibility of video conferencing and the related teleconference data, which are held within the European Economic Area (EEA).

- c) Supervisory, audit, independent, judicial, police, public and/or other authorities and bodies within the scope of their statutory tasks, duties and powers (i.e. Hellenic Capital Market Commission, Financial and Economic Crime Unit, Greek Financial Intelligence Unit), when transferring to them is required or provided by the law.

ATHEX has duly ensured that those who process personal data on its behalf, as processors of personal data, in accordance with the aforementioned, meet all the requirements and provide adequate assurances for the implementation of appropriate technical and organizational measures, so that such processing complies with the requirements of the GDPR and the applicable legal and regulatory framework and ensures the protection of the rights of the data subjects and are bound a priori to maintain data confidentiality, know and follow ATHEX's instructions on the processing of personal data and take all appropriate measures to protect them.

V. Is data transferred to countries outside the EEA or to international organizations?

ATHEX does not transmit any personal data collected for these purposes, outside the European Economic Area (EEA).

If a transfer to a third country or an international organisation is required in the future, it will be carried out under the conditions of legal and secure transfer provided for by Regulation 2016/679 (Chapter V thereof) and national legislation.

VI. How long is data retained?

The personal data will be stored/kept by ATHEX for the period of time determined by law and in general required by the legal and/or regulatory framework in force or for the purposes of legitimate interests of ATHEX, for the exercise of claims and for the defense of ATHEX in case of litigation, for the pursuit of claims of ATHEX as well as for the performance of contractual obligations and in general in accordance with the respective legal basis and the purpose of their processing.

VII. What rights does the Data Subject have for the protection of her/his personal data?

According to GDPR, the data subject has the following rights, which may be exercised on a case-by-case basis:

- a) Right of access to his/her personal data
- b) Right to rectification and/or completion of his/her data
- c) Right to erasure/right to be forgotten
- d) Right to restrict processing
- e) Right to object to the processing of his/her data
- f) Right to the portability of his/her data

VIII. How can a Natural Person exercise her/his rights?

In order to exercise her/his rights, a Natural Person may contact ATHEX:

- In writing to:
Hellenic Exchanges – Athens Stock Exchange S.A.
110 Athinon Avenue, 104 42 Athens
c/o: Data Protection Officer (DPO)
- Through email to ATHEX Group's Data Protection Officer to: dataprotectionofficer@athexgroup.gr

ATHEX shall use its best endeavors to address the Natural Person's request within thirty (30) days of its receipt. The abovementioned period may be prolonged for sixty (60) more days, if deemed necessary according to the discretion of ATHEX, taking into account the complexity of the issue and the number of the pending requests. ATHEX shall inform the Natural Person within thirty (30) days after receipt of her/his

request in any case of prolongation of the abovementioned period, stating the reasons of such prolongation.

If ATHEX does not take action in relation to a Natural Person's request, it shall inform the latter without delay within thirty (30) days of the receipt of her/his request at the latest, for the reasons it did not take action and for the possibility of the Natural Person to submit a complaint and initiate judicial proceedings. The abovementioned service is provided free of charge. However, in case the requests are obviously unfounded, excessive or repetitive, a reasonable fee may be imposed after the Natural Person has been informed accordingly, or ATHEX may refuse to respond to such requests.

IX. How are Natural Persons' rights protected?

ATHEX applies an information security management system to ensure the confidentiality, the security of the data processing and the protection of personal data against accidental or unfair destruction, loss, alteration, unauthorized disclosure or access and any other form of unfair processing. ATHEX has taken the appropriate organisational and technical measures for the security and protection of personal data from any form of accidental or unfair processing, and its specially authorised personnel that processes personal data, has received appropriate training, guidance and information. The measures taken shall be reviewed and modified at regular intervals or when deemed necessary in the light of new needs and technological developments.

X. Right to lodge a complaint

If the Natural Person believes that a) any request submitted has not been adequately and legally satisfied, or b) the Natural Person's right to personal data protection is breached by any processing that is carried out by the Company, the Natural Person has the right to lodge a complaint with the Hellenic Data Protection Authority (postal address: 1-3 Kifissias Ave., 115 23, Athens, <https://www.dpa.gr/>, tel. 210 6475600, e-mail: contact@dpa.gr).

B. CONTACT DETAILS OF THE DATA CONTROLLER

Hellenic Exchanges – Athens Stock Exchange S.A.

Address: 110 Athinon Avenue, 104 42 Athens

Contact phone number: +30 210 33 66 800

Email: protocol@athexgroup.gr



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