

# INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE SHAREHOLDERS OF THE COMPANY "IDEAL HOLDINGS S.A."

## INTRODUCTION

IDEAL HOLDINGS S.A., a company based in Athens at 25 Kreontos Street, T. K 10442, with VAT number 094035282 (hereinafter "the Company") as Data Controller, pursuant to the General Data Protection Regulation (EU) 2016/679 (hereinafter the "GDPR"), Law 4624/2019 and the other provisions of the relevant Greek and EU legislation on the protection of personal data, hereby provides the necessary information on the processing of personal data of natural persons who are shareholders of the Company and who are shareholders of the Company, the legal representatives and proxies of the shareholders, anyone who has the right to vote and generally draws and/or exercises the right to vote by representing legal entities and those who participate in any capacity at the Extraordinary General Meeting by teleconference on 20<sup>th</sup> July 2023, as well as at any adjourned, postponed or repeated General Meeting (hereinafter for the purposes of this document all the above categories of natural persons will be referred to jointly as the "Shareholders" and each of them as the "Shareholder").

In addition, the Company hereby informs the natural persons other than the Shareholders who will participate in the Company's Distance General Meeting, such as, for example, members of the Company's Board of Directors, auditors and legal advisors and other third parties, that it processes personal data concerning them, which are collected directly from the subjects for the purposes of legitimate interests pursued by the Company for such processing.

The Company processes the personal data of the data subjects lawfully, always for legitimate and legitimate purposes, respecting the principles of proportionality, fair and transparent processing, applying appropriate technical and organizational measures, in compliance with the requirements of the GDPR and the applicable legal framework, always having as a guiding principle and primary concern the safeguarding and protection of personal data and the fundamental rights of the data subjects. With this form, the Company, in compliance with the principle of transparency, provides the aforementioned individuals with information on how their personal data is processed, the type of data, the duration and purpose of the processing and their rights as personal data subjects. This information may be supplemented by more specific information on a case-by-case basis.

### **1. Type of personal data**

The Company processes personal data concerning you for the purposes described herein, considering the basic principles of personal data processing, your fundamental rights and the applicable legal framework. In particular, the Company processes the following personal data:

1. Identification data such as: first name, surname, passport or identity card number, patronymic, date and place of birth, VAT number, home address, gender, electronic identification data such as username and email.
2. Contact data such as personal and company mobile phone number and email address.
3. Information included in the CV such as, but not limited to, skills, education, history of previous work experience or activity, etc.)
4. Number and class of shares Share number and class of shares Share number in the Intangible Securities System (SSS)
5. Data on the status on the basis of which the Shareholder participates in the General Meeting and the relevant supporting documents. Data on correspondence with Shareholders.
6. Data relating to the participation and exercise of the Shareholder's voting rights in the General Meeting of the Company, details of various requests submitted to the Company from time to time, Shareholder signatures and, in general, any other information in the context of the application of the provisions in force from time to time on financial instrument markets.

7. Audio data (audio recording) in case a Shareholder takes the floor during the General Meeting.

The above data are collected either directly by you or by third parties acting on your behalf (e.g. representatives, proxies, etc.) or related to you, or by the Company itself (e.g. resulting from your appointment as a member of the Board of Directors to the Company, from the Company's communication media and IT systems, recording of accesses and image capture of the Company, etc.). The Company may collect additional personal data, provided that such processing is fully legalized.

The above personal data are collected either directly by the Shareholders themselves, for the processing of matters concerning them - who should ensure that their data are updated, so that the Shareholders' Register is always up-to-date and updated - or by third parties authorised by the Shareholders, or by the public limited company "Greek Central Securities Depository S.A", which, as the administrator of the Dematerialised Securities System (DSS), maintains the Shareholders' identification data and other information concerning the Company's shareholder base, share transactions and is made available to it through electronic records, in accordance with the provisions of the applicable legislation and the Regulations of the Dematerialised Securities System (DSS).

The Company informs the Shareholders that for the purposes of their participation in the Distance Extraordinary General Meeting or any Repeat General Meeting, the "Greek Central Securities Depository S.A." which has been entrusted with the organization of the General Meeting in distance, the access codes of the Shareholders to the online platform <https://axia.athexgroup.gr>, through which they will be able to participate and vote remotely in the General Meeting (hereinafter referred to as the "Online Platform"). Additionally, the Company informs the Shareholders that pursuant to article 131 (Voting in the General Meeting) par. 2 of Law 4548/2018, remote voting is open and the exercise of voting rights by the Shareholder and the content of his/her vote, if requested, may be disclosed to the other participants of the General Meeting, Shareholders.

In addition, the Company processes the following data of natural persons, other than Shareholders, who will participate in the video conference of the remote General Meeting, auditors, legal and other third parties, which are collected directly from these data subjects, for the purposes of the legitimate interests pursued by the Company for such processing:

- i. Identification data, such as full name, patronymic, identity card, passport or other equivalent document.
- ii. Data relating to the status by virtue of which such persons are entitled to participate in the General Assembly.
- iii. E-mail address, mobile telephone number, for the purpose of the participation of the natural person in the teleconference.
- iv. Image - audio (video) data from the participation of the natural person in the General Assembly

## **2. Purposes of Processing of Personal Data**

The Company collects and processes the personal data of Shareholders and other participants of the General Meeting for the compliance of the Company with legal obligations, for the fulfilment of legitimate processing purposes and always in accordance with valid legal bases that establish the legitimacy of such processing. In particular, the Company processes the personal data of natural persons for:

- i. the identification of the Shareholder and for communication purposes
- ii. the control of the possibility and legality of the exercise of Shareholders' rights in accordance with the legislation, indicatively, the exercise of participation and voting rights in the General Meeting, confirmation of shareholding status, list of Shareholders, keeping the minutes of

- the General Meeting, conducting and implementing corporate actions (such as dividend distribution, share capital increase, etc.),
- iii. notification to the Athens Exchange of transactions of obligated persons and monitoring of transactions in the Company's shares,
  - iv. the fulfilment of the Company's contractual obligations towards the Shareholders (such as distribution, payment of dividends) and in general the fulfilment of the Company's obligations towards its Shareholders,
  - v. the fulfilment and support of legal rights, the defence and service of the Company's legitimate interests, unless such interests are overridden by the interests or fundamental rights and freedoms of data subjects which require data protection,
  - vi. the fulfilment of obligations arising from the provisions of tax legislation and other mandatory provisions and, in general, for the compliance of the Company with its legal obligations,
  - vii. the maintenance and management of the Shareholders' register, in accordance with the provisions of the applicable legislation,
  - viii. the publication of the Company's acts and data in the General Commercial Register (G.E.M.I.), the Athens Stock Exchange or on the Company's website, when required by law,
  - ix. the Company's response to requests of the Shareholders, the processing of requests of the Shareholders in the context of services provided by the Company (e.g. issuance of certificates), the provision of answers and clarifications to specific questions or requests addressed to the Company by the Shareholders.
  - x. the maintenance of a historical record of the Company's Shareholders

### **3. Categories of recipients**

Only employees and executives of the Company and its subsidiaries have access to the personal data of the above individuals, within the scope of their responsibilities and exclusively in the context of the performance of the tasks assigned to them. The Company does not make any transmission, disclosure of personal data to third parties, except for:

- i. To natural and legal persons to whom the Company assigns the performance of specific tasks on its behalf, such as, among others, database management companies, archive storage and management companies, providers of postal services, development services, maintenance of IT application configuration services, providers of e-mail services, internet hosting services, including cloud services, lawyers and law firms, certified public accountants or auditors, lawyers and law firms, auditors, accountants and auditors, lawyers and law firms.
- ii. The public limited company "Greek Central Securities Depository S.A.", which has been entrusted as processor on behalf of the Company, the organisation of the remote General Meeting and the sub-processor (further processor) of the public limited company "Greek Central Securities Depository S.A." ZOOM Video Communications Inc., which provides the ZOOM Meetings service with which the video conference facility is provided and the relevant data of the video conference is kept within the European Economic Area (EEA).
- iii. Supervisory, auditing, independent, judicial, police, public and/or other authorities and bodies, (e.g. GEMI) within the framework of their statutory responsibilities and powers (e.g. the Securities and Exchange Commission, the FSA, the Anti-Money Laundering Authority)
- iv. Other Shareholders of the Company, as appropriate and always in accordance with the law.

The Company has lawfully ensured that those who process personal data on its behalf, in accordance with the above, meet all the requirements and provide sufficient assurances for the implementation of appropriate technical and organisational measures, in such a way 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 data subjects.

The Company does not transfer personal data to third countries (outside the EEA) unless the following cases apply: (a) if the European Commission has issued an act for the adequate protection of personal data in the country or international organisation in question, (b) if the Shareholder has been specifically informed and has given his/her explicit consent to the Company and the other requirements of the legal framework are met, (c) if the transfer is necessary for the performance of a contract, (d) if the transfer is necessary for the establishment, exercise or support of legal claims or the defence of the Company's rights; (e) if there is a relevant obligation under a legal provision or an intergovernmental or international agreement; or (f) in the context of the Company's compliance with the rules of automatic exchange of information in the tax area, as they result from the regulatory and legislative framework. In order to fulfill the obligations under e) or f) above, the Company may transfer the Shareholder's personal data to competent national authorities, in order to be forwarded through them to the respective authorities of third countries.

#### **4. Duration of processing - Retention period of personal data**

The Company will retain the personal data referred to herein for as long as necessary to achieve the purposes for which the Company had collected them and in any case for as long as required by law or required in order for the Company to support any legitimate interests, to meet any obligations and controls and to fulfil its contractual obligations.

#### **5. Rights of Data Subjects**

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

- i. To know which personal data concerning him or her are held and processed by the Company, such as, their origin as well as the purposes of such processing, the categories of data, the recipients or categories of recipients (**right to inform and access**).
- ii. To request the rectification and/or completion of the data in order to make them complete and accurate, by presenting any necessary document from which the need for completion or rectification arises (**right of rectification**), which is also an obligation of the data subject.
- iii. Request the restriction of data processing, inter alia, where the accuracy of the personal data is contested or the processing is unlawful, and provided that there is no legitimate ground for retaining the data (**right to restriction of processing**).
- iv. To refuse and/or object to any further processing of his/her personal data held by the Hellenic Republic (**right to object**).
- v. To request the deletion of his/her data from the Company's records, inter alia, when there is no longer a valid reason for processing, without prejudice to the Company's obligations and legal rights to retain them under the applicable laws and regulations (**right to be forgotten**).
- vi. To request the Company to transfer the data provided to it in a structured, commonly used and machine-readable format or to request the transfer, transfer of such data to any other controller, provided that the processing is based on consent and carried out by automated means and without prejudice to the Company's legal rights and obligations to retain the data (**right to data portability**).

The Company has in any case the right to refuse to comply with a Shareholder's request for restriction of processing or deletion of his/her personal data, if the processing or the keeping of such data is necessary for the maintenance of the shareholder's shareholding and/or voting rights, for the exercise of his/her rights as a Shareholder of the Company and/or as a person with voting rights, as well as for

the establishment, exercise or support of the Company's legal rights, the compliance of the Company with its legal obligations or the fulfilment of its obligations. The Company shall in any case have the right to refuse to delete personal data of a Shareholder if it is necessary for the purpose of maintaining a historical record of Shareholders and if the processing or maintenance of the data is necessary for the establishment, exercise or support of its legal rights or the fulfilment of its obligations. It is noted that the exercise of the right to portability does not imply the deletion of data from the Company's records. The exercise of the above rights generally acts for the future and does not relate to data processing already carried out.

In the event that a natural person wishes to exercise the above rights, he/she should submit his/her request in writing to the Company in the following ways:

By physical mail to:

Ideal Holdings S.A.

25 Kreontos Street, 10442 Athens, Greece

Attn: Legal Department

By e-mail to: [legal@ideal.gr](mailto:legal@ideal.gr)

The Company will act on the request without delay and at the latest within thirty (30) days from the receipt of the request. This deadline may be extended considering the complexity of the request and the number of requests, and the Company will inform the subject in writing of such extension within thirty (30) days of receipt of the request and the reasons for the delay. In the event that the request cannot be satisfied, the Company shall, within thirty (30) days of the submission of the request, provide a reasoned notification of the rejection of the request. Finally, the subjects have the right to lodge a complaint with the Data Protection Authority. (1-3 Kifissias Street, P.C. 115 23, Athens, Phone: 210 6475600, Fax: 210 6475628, E-mail: [contact@dpa.gr](mailto:contact@dpa.gr), Website: [www.dpa.gr](http://www.dpa.gr))

## **6. Security of Data**

The Company has implemented appropriate technical and organizational security measures in order to prevent the loss of personal data, or access to unauthorized persons and/or alteration of personal data. In addition, procedures and policies have been put in place to protect personal data, exercise the rights of the subjects, deal with personal data breaches, as well as controls and restrictions on access to physical and electronic data.