



**ATHEX**  
*Athens Stock Exchange*

Information on the processing of  
personal data of the shareholders  
of

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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 who are or were registered shareholders of ATHEX, or of those who have the capacity of the shareholder of ATHEX (hereinafter, for the purposes of the present, all the above categories of natural persons will be jointly referred to as “Shareholders” and each of them as “Shareholder”).

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 Shareholders, 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 Shareholders 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 Shareholders which are collected and processed by ATHEX in the context of the operation and service of the shareholder capacity and in order to carry out the tasks required under the shareholder relationship 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 concerning the Shareholders, which ATHEX processes for legitimate purposes of processing, are the following:

- a) Identification data, such as: name and surname, father's name, identity card number or other equivalent document, passport number, 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) Number and type of shares.
- d) Investor Share Code Number in the Dematerialized Securities System (DSS).
- e) Data relating to the capacity under which the Shareholder participates to the General Meeting and the relevant supporting documentation.
- f) Correspondence and communication data.
- g) Data relating to the participation and the exercise of the voting right of the Shareholder in the General Meeting of ATHEX, including the data required to participate in an electronic teleconference (e.g. access codes).
- h) information regarding any requests by Shareholders addressed to ATHEX, signature of the Shareholders and in general any information in the context of implementing the current rules on markets for financial instruments.
- i) Audio data (audio recording) in case the Shareholder takes the floor during the General Meeting.

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

The above personal data are collected either directly from the Shareholders for the performance of tasks concerning them – who should ensure that their their personal data are kept up-to-date, so that the Shareholders' Registry remains update up-to-date and accurate –either from third persons authorized by the Shareholders, either from the societe anonyme under the name “Hellenic Central Securities Depository S.A.”, which, at its capacity as operator of the Dematerialized Securities System (DSS), keeps the details of identification of the Shareholders as well as other information related to ATHEX's shareholder structure, and transactions on the shares which are provided to ATHEX through electronic records, according to the provisions of the legislation in force and the Regulation of the Dematerialized Securities System (DSS).

ATHEX hereby notifies the Shareholders that, for reasons of participation to the remote General Meeting of the Shareholders of ATHEX, or any adjournment or repeat meeting thereof, will be collected and processed either by ATHEX either by the societe anonyme under the name “Hellenic Central Securities Depository S.A.”, to which ATHEX has assigned the organization of any remote General Meeting, the codes of process of the Shareholders 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”). Furthermore, ATHEX informs the Shareholders that, according to article 131 (way of voting in the General Meeting) par. 2 of Law 4548/2018, the remote voting is open and the exercise of the right to vote by the Shareholder and the content of his/her vote, if requested, may be communicated to the other participating Shareholders in the 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 Shareholders, as above mentioned, and in general processes them, for the fulfillment of legitimate purposes of processing and always according to a valid legal basis which establishes the lawfulness of the processing.

Specifically, ATHEX processes the personal data of natural persons in order:

- a) To identify the Shareholder.
- b) To communicate with Shareholders.
- c) To verify the possibility and legality of exercising Shareholders' rights, according to law (indicatively exercise of the right of participation and voting right in the General Meeting, shareholder confirmation, drawing up a shareholders' list, keeping minutes of the General Meeting, participation to corporate actions (i.e. dividend distribution, share capital increase etc.).
- d) To disclose transactions of liable individuals to the Athens Stock Exchange and to monitor transactions on ATHEX's shares.
- e) To fulfil ATHEX's contractual obligations towards Shareholders (such as distribution, payment of dividends) and in general the fulfilment of ATHEX's obligations towards its Shareholders,
- f) To provide to Shareholders access to an electronic platform for electronic teleconferences (Axia eShareholders' Meeting),
- g) To fulfil and support legal rights, the defense and service of ATHEX's legitimate interests (such as in the context of legal claims of ATHEX),
- h) To fulfil obligations arising from the provisions of tax legislation and other mandatory provisions,
- i) To maintain and manage a Shareholder Registry, in accordance with the provisions of the legislation in force,
- j) To publish acts and data of ATHEX in the General Commercial Register (G.E.M.I.), the Athens Stock Exchange or on ATHEX's website, when required by law,
- k) For ATHEX to respond to requests from Shareholders, process requests from Shareholders in the context of services provided by ATHEX (e.g. the issuance of certificates),
- l) To provide answers and clarifications to specific questions or requests addressed to ATHEX by Shareholders,
- m) To keep an archive of ATHEX's shareholders.

For the aforementioned 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), b), c), d), f), h), i) and j), 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. Article 40 of Law 4548/2018, as applicable to the obligation to keep a shareholder registry, Articles 123, 124 and 125 of Law 4548/2018 on the rights of shareholders prior to the General Meeting and the obligations arising from the holding of remote General Meetings, Articles 9, 10, 11 and 27 of Law 3556/2007 on the obligation to disclose to the Shareholders the total percentage of voting rights and share capital of ATHEX held by them.

For the above purposes e) and k), the legal basis is the fact that the processing is necessary for the performance of the rights and obligations of ATHEX and/or the Shareholder, as arising from the shareholding relationship of the parties.

For the processing carried out in pursuit of the above purposes g), l), 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 its Shareholders, 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 above natural persons shall be awarded only to the ATHEX' s employees and executives, within the range of their responsibilities and in the exercise of the duties assigned to them and specifically access shall be awarded to those who are responsible for these natural persons' identification, for reviewing the lawful exercise of their rights, and for responding to Shareholders' requests.

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.
- d) Other ATHEX shareholders, as appropriate, in accordance with the law.

ATHEX has duly ensured that those who process personal data on its behalf, as processors of personal data, in accordance with the above, 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 to any third country or international organization at this time. Any potential future transfer will be made, in full compliance with the provisions of the GDPR, under the following conditions:

- a) when the European Commission has issued an implementing act for the adequacy of personal data protection level within that third country, or the international organization.

- b) when the Shareholder has been specifically informed and has given her/his express consent to ATHEX, provided also that the other conditions laid down in the legislative framework are met,
- c) where the transfer is necessary for the execution of contractual obligations,
- d) where the transfer is necessary for the establishment, exercise or support of legal claims or the defense of ATHEX's legal rights,
- e) where the transfer is necessary under a statutory provision or a transnational convention or an international convention, or
- f) for the purposes of the ATHEX's compliance with rules relating to automatic exchange of information in the taxation area, as those are provided for by the statutory and regulatory framework.

In order to fulfill the obligations under points e) or f) above, ATHEX may transfer shareholder's personal data to the competent national authorities, in order for them to forward these data to the relevant authorities of third countries.

#### 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 is required 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 shareholder have for the protection of her/his personal data?

According to the 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 shareholder exercise her/his rights?

In order to exercise her/his rights, a Shareholder 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](mailto:dataprotectionofficer@athexgroup.gr)

ATHEX shall use its best endeavors to address the shareholders' 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 Shareholder 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 Shareholder's request, it shall inform the Shareholder 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 shareholder 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 Shareholder has been informed accordingly, or ATHEX may refuse to respond to such requests.

## IX. How are shareholders' rights protected?

ATHEX applies an information security management system to ensure the confidentiality and security of the shareholders' 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 amended at regular intervals or when deemed necessary on the basis of new needs and technological developments.

## X. Right to lodge a complaint

Shareholders have the right to lodge a complaint with the Hellenic Data Protection Authority (1-3 Kifisias Ave, 11523 Athens, tel +30 210 6475600, email: [contact@dpa.gr](mailto:contact@dpa.gr), [www.dpa.gr](http://www.dpa.gr)), which is the competent supervisory authority for the protection of the fundamental rights and freedoms of natural persons with regard to their personal data processing, when they believe that their rights are infringed in any way, as well as the right to initiate judicial proceedings.

## 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](mailto:protocol@athexgroup.gr)



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