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**“SOCIETE ANONYME ADMIE HOLDING»**

**Annual Ordinary Meeting of the Shareholders 03 July 2024**

**SHAREHOLDERS BRIEFING ON PERSONAL DATA**

## **(A) BRIEFING ON THE PERSONAL DATA PROCESSING OF THE COMPANY SHAREHOLDERS**

The company with the name “SOCIETE ANONYME ADMIE HOLDING”, which has head office in Athens (89 Dyrachiou & Kifisou) with VAT 800799573 of the ATHENS S.A. TAX AUTHORITY, with G.C.R. number 141287501000 (hereafter the “COMPANY”), under the capacity of the processor of personal data, in the context and in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of the 27<sup>th</sup> April 2016 (hereafter “General Regulation for the data protection” or “GDPR”), the L. 4624/2019 and in general the effective legislation each time on the protection of personal data, with the document hereby provides the required information on the processing of personal data of the natural persons who are or were registered shareholders of the Company, that each time have the shareholder capacity in the Company, the legal representatives and proxies of the shareholders as well as the pledge holding borrowers of the shareholders, of anybody who has the right to vote and in general gets or/and exercises rights on the shares of the Company, their representatives, those exercising the right to vote representing legal persons as well as those participating with any capacity in the General Meetings of the Company (hereafter for the purposes hereby all of the as above categories of natural persona shall be called jointly “Shareholders” and each one of them the “Shareholder”)

It is noted that as personal data processing is understood to be every action or series of actions carried out with or without the use of automated means, on personal data or sets of personal data, like the collection, registration, organization, structuring, storage and adjustment or change, or recovery, search of information, the use, notification by forwarding or any other form of disposal, the correlation or the combination, the restriction, the deleting or the destruction.

The Company, as the issuer of the shares, proceeds with a legal processing of the personal data of the Shareholders, that is the as above natural persons, under the previously mentioned of the capacities Η Εταιρεία, ως εκδότρια των μετοχών, προβαίνει σε σύννομη επεξεργασία των , always for legal and accepted purposes, observing the principles of fair and transparent processing, applying the proper technical and organizational measures, being in compliance with the dictates of the GDPR as well as of the each time applicable legal framework, always having as basis and primary concern the safeguarding and protection of the personal data and of the fundamental rights of the subjects of the data.

Next to the above the Company in compliance with the principle of transparency, proceeds hereby, with briefing of the Shareholders related with the terms of personal data processing that concern them.

**(I) What personal data does the Company process and where does it collect them from**

The personal data of the Shareholders that it collects and then processes the Company in the context of operation and service of the shareholder capacity and for the completion of the works governing the said shareholder relationship, are those extremely necessary, suitable, and similar and it is about personal data limited to the necessary for these purposes for which they are subjected to processing.

Indicatively, there is presentation of the main categories of personal data involving the Shareholders and which the Company processes for the fulfillment of legal processing purposes:

(a) Identification data and identification documents, like full name, father's name, spouse's name, date of birth, number and copy of identification card or passport or other equivalent document, Tax Identification Number (T.I.N.) and competent Tax Office, country of tax residence, any special tax handling, occupation/activity, nationality, and other demographic details.

(b) Communication data, such as postal and electronic address (e-mail), landline and mobile phone.

(c) Bank account number.

(d) Number and category of shares. se

(e) Code Number of Investor Share in the Intangible Securities System (I.S.S.), Account of Securities in the Intangible Securities System and the Intangible Titles System, Shareholder Registration Number.

(f) Correspondence data to with the Shareholders.

(g) Data related with the capacity based on which the Shareholder participates in the Company General Meeting and the relevant documentary proofs, share data and of the rights held over them, information relating to the transaction active shares.

(h) Data concerning the participation and the exercise of voting rights of the Shareholder in a Company General Meeting, data of different requests submitted occasionally to the Company,

signature of Shareholders and in general any other information in the context of application of each time applicable provisions for the markets of financial means.

The above personal data are collected either directly from the Shareholders themselves, for the handling of issues involving them – who must care for the updating of their details, so that the Shareholders' Register is always updated and informed either by third party persons authorized by the Shareholders, or by the incorporated company with the name "Hellenic Depository of Titles S.A.", which as manager of the Intangible Securities System (I.S.S.) maintains the identification data of the Shareholders as well as other information concerning the share basis of the Company, through electronic files, according to the provisions of the applicable legislation and the Regulation of the Intangible Securities System (I.S.S.).

## **(II) What are the objectives of the personal data processing**

The Company collects the personal data of the Shareholders, according to the above and in general processes them, for the fulfillment of legal processing purposes and always in accordance with valid legal bases founded on the legality of the processing in question.

More specifically the Company processes the personal data of the Shareholders for :

- (a) the identification of the Shareholder,
- (b) the communication with the Shareholder.
- (c) to check the possibility and legality of exercising the rights of the Shareholders, according to the legislation, as well as the facilitation of the Shareholders to exercise their rights arising from the law (indicatively exercise of rights of participation and vote and in general exercise of rights of the Shareholders in General Meetings, confirmation of the shareholder capacity, status of shares, observance of practices of the General Meeting, participation in corporate actions, distribution of dividend),
- (d) the conduct and implementation of corporate actions (such as dividend distribution, share capital increase etc.), the disclosure to the Athens Stock Exchange of transactions of liable persons, the monitoring of transactions over the Company shares,
- (e) the execution of the contractual obligations of the Company against the Shareholders (like for the distribution, payment of the dividend) and in general fulfillment of the obligations of the Company against the Shareholders,

- (f) the compliance of the Company with its legal obligations,
- (g) the fulfillment and the support of legal rights, the defense and service of legal interests of the Company (like the context of legal claims of the Company), unless if against the said interests supersedes the interest or the fundamental rights and freedoms of the subjects of the data imposing the data protection,
- (h) the fulfillment of obligations stemming from provisions of the tax legislation and other provisions of mandatory nature,
- (i) the observance and management of a Shareholders' book, according to the provisions of the applicable legislation,
- (j) the conduct of transfers of shares outside the stock exchange,
- (ja) the publication of actions and details of the Company to the General Commercial Register (G.C.R.), the Athens Stock Exchange or the Company website, when required by law,
- (jb) the response of the Company to requests of the Shareholders, the handling of requests of the Shareholders in the context of the services rendered by the Company (e.g., issue of certifications), the supply of answers and clarifications on specific questions or request's addressed to the Company by the Shareholders.
- (jc) keeping a historical record of the Company Shares.

### **(III) The receivers of the personal data**

Only employees and executives of the Company have access to the personal data of the Shareholders, within the scope of their responsibilities and in the exercise of the duties assigned to them, and in particular those who are responsible for the identification of the Shareholders and the control of the legality of the exercise of their rights.

The Company shall not transfer, disclose, or communicate the personal data of Shareholders, except:

- (a) To natural and legal persons to whom the Company entrusts the performance of specific tasks on its behalf, such as, among others, providers of technical and support services, database management companies, file storage and management companies, providers of postal services, development, maintenance and configuration of IT applications, providers of e-mail services, internet hosting services, including cloud services, in general..

(b) The incorporated company with the name "Hellenic Central Securities Depository S.A."

(c) To supervisory, auditing, tax, independent, judicial, police, public and/or other authorities and bodies within the framework of their statutory powers, duties and authorities (including but not limited to the Hellenic Corporation, the European Central Bank, the Capital Market Commission, the Athens Stock Exchange, the Central Securities Depository, the Authority for Combating Money Laundering, the Deposits and Loans Fund, the General Commercial Registry).

(d) Other Company Shareholders, in each case, according to what is provisioned in the law.

(e) Other companies falling under the Company Group.

The Company has lawfully ensured that those who process personal data on its behalf, in accordance with the foregoing, meet all the requirements and provide sufficient assurances that appropriate technical and organizational measures are in place to ensure that such processing complies with the requirements of the GDPR and the applicable legal and regulatory framework and that the rights of data subjects are protected.

In the event that any transfer of personal data to third countries (to countries outside the European Economic Area (EEA) or to international organizations is required, such transfer and processing in general will always be carried out in compliance with the GDPR and in general with the legal framework relating to the protection of personal data and only if the conditions and provisions of the GDPR are respected and applied in order to ensure that the level of protection of natural persons guaranteed by the GDPR is not undermined..

#### **(IV) Personal data term of maintenance**

The period of keeping the personal data of the Shareholders by the Company, in the context of their shareholding, is determined for the entire duration of the Company and in accordance with the applicable institutional framework.

The personal data are kept by the Company for the period of time, which is defined by law and generally required by law and in accordance with the applicable legal and/or regulatory framework or required to serve and defend the legitimate interests of the Company, to assert claims and defend the Company in the event of litigation, to pursue the Company's claims and to fulfil its contractual obligations and generally in accordance with the applicable legal basis.

#### **(V) Protection and safety measures of the personal data**

The Company has incorporated in its systems, policies, and internal procedures all technical and organizational measures aimed at ensuring the legality, objectivity of processing, transparency, purpose limitation, minimization, accuracy, limitation of the period of data storage, integrity and confidentiality and is in full compliance with all the principles that must govern the processing of personal data of Shareholders, as provided for in the GDPR. At the same time, the Company applies appropriate technical and organizational security measures in its systems and procedures, in order to protect the confidentiality, integrity and availability of personal data, as well as to protect the data from unauthorized or unlawful processing, from accidental loss, destruction or damage, alteration, unauthorized dissemination or access and, in general, from any other form of unlawful processing.

#### **(VI) Rights of the data subjects**

The Shareholder, as subject of the data, maintains, according to the GDPR, the following rights, which may be exercised in each case:

(a) **Right of access** to the personal data concerning him/her and in particular to know which personal data concerning him/her are held and processed by the Company, their origin as well as the purposes of such processing, the categories of data, the recipients, or categories of recipients (Article 15 GDPR).

(b) **The right to correct inaccurate data** and to complete incomplete data in order to make them complete and accurate, by providing any necessary document showing the need for completion or correction (Article 16 GDPR).

(c) **The right to erasure** (right to be forgotten) of personal data, 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 laws and regulations in force at the time (Article 17 GDPR).

(d) **The right to restrict processing**, either because the accuracy of the data is contested, or because the processing is unlawful, or because the purpose of the processing has ceased to exist and provided that there is no legitimate reason for retaining the data (Article 18 GDPR).

(e) **Right to the portability of personal data**, pursuant to which the Shareholder has the right to receive the data concerning him/her that he/she has provided to the Company in a structured, commonly used and machine-readable format or to request the transmission, 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.

(f) **The right to oppose and object to the processing** of data relating to him/her on grounds relating to the particular situation of the Shareholder in the event that the processing is carried out for purposes of legitimate interests pursued by the Company or a third party or for the performance of a task carried out in the public interest or in the exercise of official authority (Article 21 GDPR).

The Shareholder, as a data subject, also has the right to object to a decision of the Company taken solely on the basis of automated processing, including profiling, if it produces unlawful effects concerning him or her or significantly affects him or her in a similar way, unless there are specific grounds under applicable law.

(g) Where the processing is based on the prior explicit consent of the Shareholder, the Shareholder reserves the right to withdraw such consent at any time, without prejudice to the lawfulness of the processing based on the consent, prior to its withdrawal.

(h) **Right to lodge a complaint** with the competent authority, whereby the Shareholder has the right to lodge a complaint with the Data Protection Authority ([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, against the processing of data concerning him/her, if he/she considers that his/her rights are infringed in any way and that the processing of his/her data is carried out in violation of the applicable legislation, as well as the right to a judicial remedy

It is further noted that the Company has in any case the right to refuse to comply with a Shareholder's request, if the processing is necessary, for example, to maintain the shareholding and/or voting rights, to exercise the rights as a Shareholder of the Company and/or as a person with voting rights, as well as to establish, exercise or support the Company's legal rights, to comply with the Company's legal obligations or to fulfil its obligations towards the Shareholders.

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, as well as 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.



The exercise of the right to portability does not imply the deletion of the data from the Company's records.

(VII) How to exercise the rights of data subjects

Any request by Shareholders regarding personal data concerning them and processed by the Company, as well as for the exercise of their rights, must be addressed in writing to the Company and sent either to [office@admieholding.gr](mailto:office@admieholding.gr) or delivered to the Company's headquarters.

Refusal of the Company or unjustified delay with regard to the satisfaction of requests of the Shareholders, in the exercise of the rights of the Shareholders, gives them the right to appeal to the Personal Data Protection Authority, who is the subject matter competent supervisory authority for the application of the GRPD according to the foregoing.

The Company, based on policy each time for the protection of personal data in the context of the each time effective legislative and regulatory framework, may review or /and amend the present briefing, which updated shall always be available at the website <https://admieholding.gr/el/genikes-synelefsis-metochon/#>

**(B) SUPPLEMENTARY INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE SHAREHOLDERS OF THE COIMPANY "ADMIE HOLDING" AND OF THE OTHER PARTICIPANTS IN REMOTE GENERAL MEETINGS OF THE COMPANY "SOCIETE ANONYME ADMIE HOLDING"**

The Company, in its capacity of controller, and in addition to the above mentioned under item (A) Information on the processing of personal data of the Shareholders of the Company "ADMIE S.A.", informs the Shareholders that for the purpose of their participation in the Annual General Meeting of the Shareholders of the Company, which is to be held on Wednesday, July 3, 2024, at 10:00 a.m. 00 as well as at any postponed, adjourned or repeated thereof, and which will be held remotely, in real time, via videoconference and using electronic means and in accordance with the provisions of the Company's Articles of Association and under the terms of applicable law - as well as for the purposes of their participation in the future in any other Annual General Meeting of the Company held at a distance, in any other Annual General Meeting of the Company held at a distance or in any repeated Annual General Meeting of the Company held at a distance and, in general, for the reasons of their participation in the future in any other Annual General Meeting of the Company held at a distance, in any other Annual General Meeting of the Company held at a distance or in any repeated Annual General Meeting of the Company held at a distance and, in general, for the purposes of their participation in the future in any other Annual General Meeting of the Company held at a distance. E.", a processor on behalf of the Company, to which the Company has entrusted the organization of the Distance General Meeting or any other processor on behalf of the Company, to which the Company entrusts the organization of any Distance General Meeting, 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 Ordinary General Meeting (hereinafter referred to as "Online Platform").

The Company also informs the Shareholders that, pursuant to Article 131 (voting method at the Ordinary General Meeting) para. 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 Ordinary General Meeting, Shareholders.

Additionally, the Company, with the supplementary information hereby informs, under the capacity of the processor, according to the GRPD, the Law 4624/2019 and the other provisions on

the protection of personal data, the natural persons beyond the Shareholders, who will participate in the teleconference (video conference) of the remote General Meeting, as they are Members of the Board of Directors of the Company, administrative executives of the Company, auditors and other third parties, that it is proceeding with the processing of their data below, which are collected directly from the said data subjects, for the purposes of legal interests pursued by the Company for the processing in question:

- a) Identification data, such as full name, patronymic, identity card, passport, or other equivalent document.
- b) Data concerning the status by virtue of which such persons are entitled to participate in the General Assembly.
- c) Email address, mobile phone number, for the purpose of the participation of the natural person in the teleconference.
- d) Image - audio (video) data from the participation of the natural person in the General Assembly. The recipients of this data are the executives of the Company responsible for the management of the General Meeting, the limited liability company "Hellenic Central Securities Depository S.A." which has been entrusted by the Company, as the processor on behalf of the Company, with the organization of the remote General Meeting, as well as any sub-processors (further processors) of the limited liability company "Hellenic Central Securities Depository S.A." [such as e.g. Zoom Video Communication Inc. which provides the Zoom service with which the video conference is provided and the relevant data of the video conference is kept within the European Economic Area (EEA)], as well as any other processor on behalf of the Company, to whom the Company entrusts the organization of any remote General Meeting and any sub-processor (further processor) of the above processors.
- e) The aforementioned personal data shall be kept by the Company for the period of time required by law and generally in accordance with the applicable legal and/or regulatory framework or for the exercise of claims or the defense of the Company's legitimate interests and generally in accordance with the applicable legal basis for the retention of the data, based on the purpose served by the processing.

As for the rest, regarding the rights of the as above data subjects, according to the GRPD, as to the method of exercise of the said rights of the subjects, but also in general with regard to all of the rest, apart from the foregoing, terms related with the processing of personal data of the as above subjects of the data, shall apply all that is mentioned in the as above under details (A) Briefing about the personal data processing of the Shareholders of the Piraeus Company.

It is further noted that in the context of holding the Company's remote General Meetings, the necessary videoconferencing is conducted using platforms that support security services, it is ensured that the link of the scheduled videoconference is adequately protected and, in general, a careful study of the terms of use and the terms of protection of personal data is carried out when selecting the videoconferencing solution, in full compliance with the GDPR, Law 4624/2019 and in general the applicable legislation.