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Registration Number: 141287501000

**“HOLDING Company ADMIE (IPTO) S.A.”**  
**Extraordinary General Meeting of Shareholders**

**11 June 2026**

**INFORMATION FOR SHAREHOLDERS AND OTHER PARTICIPANTS IN THE  
EXTRAORDINARY GENERAL MEETING (IN PERSON OR REMOTELY)**

**ON PERSONAL DATA**

## **NOTICE REGARDING THE PROCESSING OF PERSONAL DATA OF THE COMPANY'S SHAREHOLDERS AND OTHER PARTICIPANTS IN THE GENERAL MEETING**

The company under the name "**HOLDING Company ADMIE (IPTO) S.A**", with registered office in Athens (89 Dyrachiou Str. & Kifisou Av.), with VAT number 800799573 (Tax Office: FAE Athens) and General Commercial Registry (G.E.MI.) number 141287501000 (hereinafter the "Company"), in its capacity as data controller, in accordance with and in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter the "General Data Protection Regulation" or "GDPR"), Law 4624/2019 and all applicable data protection legislation, hereby provides the required information regarding the processing of personal data of natural persons who are or have been registered shareholders of the Company, those who currently hold shareholder status in the Company, the legal representatives and proxies of the shareholders, as well as any pledgees of the shareholders, anyone entitled to vote and, in general, anyone who derives or exercises rights over the Company's shares, their representatives, those exercising voting rights on behalf of legal entities, as well as all persons who participate in the Company's General Meetings in any capacity (including, indicatively, Members of the Board of Directors of the Company, executives, auditors, and other third parties), either in person or remotely (hereinafter, for the purposes of this notice, all the above categories of natural persons will collectively be referred to as the "Shareholders" and each individually as a "Shareholder").

It is noted that processing of personal data 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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The Company, in its capacity as the issuer of shares, lawfully processes the personal data of the Shareholders, i.e., the aforementioned natural persons in the capacities described above, solely for legitimate and lawful purposes. It does so by adhering to the principles of fair and transparent processing, implementing appropriate technical and organizational measures, and complying with the requirements of the GDPR and all applicable legal frameworks. The Company's primary concern is always the safeguarding and protection of personal data and the fundamental rights of data subjects.

In line with the above and in compliance with the principle of transparency, the Company hereby provides this notice to inform Shareholders about the terms under which their personal data is processed.

**(I) What personal data does the Company process and from where is it collected**

The personal data of Shareholders that the Company collects and generally processes in the context of the operation and facilitation of the shareholder capacity, and for carrying out tasks governed by said shareholder relationship, are those that are strictly necessary, appropriate and relevant, and are limited to what is required for the purposes for which they are processed.

Indicatively, the main categories of personal data concerning Shareholders and which the Company processes to fulfil lawful processing purposes include:

- (a) Identification data and identification documents, such as full name, father's name, spouse's name, date of birth, number and copy of identity card or passport or other equivalent document, tax identification number (TIN), competent Tax Office, country of tax residence, any special tax treatment, profession/occupation, nationality, and other demographic data.
- (b) Contact data, such as mailing address, email address, landline and mobile phone number.
- (c) Bank account number.
- (d) Number and class of shares.
- (e) Investor Share Code Number in the Dematerialized Securities System ("DSS"), Securities Account in the DSS, Shareholder Registry Number.
- (f) Correspondence data with Shareholders.
- (g) Data regarding the capacity under which the Shareholder participates in the General Meeting of the Company and the relevant supporting documents, shareholding information and the rights attached thereto, and information regarding share trading activity.
- (h) Data concerning the participation and exercise of voting rights by the Shareholder at 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 required in the context of applying the applicable financial markets legislation.

(i) Image and audio (video) data from the participation of the individual in the General Meeting held remotely.

(j) Data related to the exercise of voting rights and the content of the vote, if requested pursuant to Article 131 paragraph 2 of Law 4548/2018 in the context of a remote General Meeting.

(k) Shareholders' access credentials to the online platform <https://axia.athexgroup.gr>, through which they will be able to participate and vote remotely at the Extraordinary General Meeting.

The aforementioned personal data are collected either directly from the Shareholders themselves, for the handling of matters concerning them - who must also ensure that their information is kept up to date so that the Shareholders' Register is always accurate and current - or from third parties authorized by the Shareholders, or from the société anonyme company under the name "Euronext Securities Athens S.A." (former "Hellenic Central Securities Depository S.A."), which, as operator of the Dematerialized Securities System ("DSS"), maintains shareholder identification data and other information regarding the Company's shareholder base and share transactions, and makes them available to the Company through electronic files, in accordance with the provisions of the applicable legislation and the Regulations of the Dematerialized Securities System ("DSS").

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

The Company collects the personal data of Shareholders as stated above and processes them for the fulfilment of lawful processing purposes, always based on valid legal grounds that establish the lawfulness of such processing.

Specifically, the Company processes the personal data of Shareholders for the following purposes:

(a) to identify the Shareholder,

(b) to communicate with the Shareholder,

(c) to verify the ability and lawfulness of exercising the Shareholders' rights according to the law, as well as to facilitate Shareholders in exercising their legal rights (indicatively, the exercise of participation and voting rights, and generally the exercise of Shareholder rights in General Meetings, confirmation of shareholder status, maintenance of the Shareholders' register, keeping minutes of the General Meeting, participation in corporate actions, and dividend distribution),

(d) to carry out and implement corporate actions (e.g., dividend distribution, share capital increases), to disclose transactions by obligated persons to the Euronext Athens (former Athens Stock Exchange) and to monitor transactions involving Company shares.

(e) to fulfil the Company's contractual obligations to Shareholders (such as dividend payments) and, more broadly, to satisfy all obligations of the Company towards its Shareholders.

(f) to ensure the Company's compliance with its legal obligations.

(g) to fulfil and safeguard the legal claims and to defend and serve the Company's legitimate interests (in the context of the Company's legal claims), unless such interests are overridden by the interest or the fundamental rights and freedoms of the data subjects requiring data protection.

(h) to comply with obligations arising from tax legislation and other mandatory legal provisions.

(i) to keep and manage the Shareholders' Register, in accordance with the provisions of applicable legislation.

(j) to carry out of over-the-counter share transfers,

(k) to publish acts and information of the Company in the General Commercial Registry (G.E.MI.), the Euronext Athens or on the Company's website, when such publication is required by law.

(l) the Company's response to shareholders' requests, the handling of shareholders' requests within the scope of services provided by the Company (e.g. issuance of certificates), and the provision of answers and clarifications to specific questions or requests submitted to the Company by shareholders.

(m) to maintain a historical archive of the Company's shareholders.

## **(II) Who are the recipients of personal data?**

Access to the shareholders' personal data is granted solely to authorized employees of the Company, as well as to third parties (Data Processors) who provide shareholder registry services and related secretarial or legal support to the Company. These parties process personal data on behalf of the Company in accordance with the authorization granted to them by the Company and are bound by obligations of confidentiality regarding their actions. Furthermore, the aforementioned third parties provide sufficient guarantees regarding the implementation of appropriate technical and organizational measures so that processing complies with the

requirements of the GDPR and ensures the protection of the data subjects' rights (Article 28 GDPR).

Specifically for the personal data of the Company's shareholders and other participants in the Company's remote General Meetings, a recipient is also the société anonyme under the name "Euronext Securities Athens S.A." (former "Hellenic Central Securities Depository S.A."), which has been assigned by the Company, as a data processor on behalf of the Company, the organization of the remote General Meeting. Other sub-processors may also be involved, such as Zoom Video Communication Inc., which provides the Zoom tools/services enabling videoconferencing through its cloud computing services, which are hosted within the European Economic Area (EEA).

The Company does not transfer, disclose, or disseminate the shareholders' personal data, except in the following cases:

(a) To third-party service providers who, on behalf of the Company, perform various services, either acting as independent data controllers or jointly with the Company, such as banks, financial service providers, external consultants, associates, lawyers, accountants, auditors, as well as providers of technical and support services. In such cases, the data processing is carried out under the supervision of the Company, solely on its mandate, and is subject to the same privacy protection policy or a policy providing at least the same level of protection.

(b) To the société anonyme under the name "Euronext Securities Athens S.A." (former "Hellenic Central Securities Depository S.A.").

(c) To supervisory, audit, tax, independent, judicial, police, public and/or other authorities and bodies, in accordance with their statutory responsibilities, duties, and powers (indicatively, the Bank of Greece, the European Central Bank, the Hellenic Capital Market Commission, Euronext Athens, Euronext Securities Athens S.A., the Central Securities Depository, the Anti-Money Laundering Authority, the Deposits and Loans Fund, and the General Commercial Registry).

(d) Other Shareholders of the Company, as the case may be, in accordance with the provisions of the law.

(e) Other companies belonging to the Company's Group.

The Company has lawfully ensured that those processing personal data on its behalf, as outlined above, meet all legal requirements and provide adequate assurances regarding the implementation of appropriate technical and organizational measures, in a manner to ensure that

such processing complies with the requirements of the GDPR and the applicable legislative and regulatory framework, and that the rights of the data subjects are effectively protected.

In the event that the transfer of personal data to third countries is required (i.e., to countries outside the European Economic Area (EEA)) or to international organizations, such transfer and any related processing shall always be carried out in compliance with the GDPR and, more generally, with the legislative framework governing the protection of personal data. Such transfers shall only occur where the conditions and provisions of the GDPR, aimed at ensuring that the level of protection of natural persons guaranteed by the GDPR is not undermined, are met and where adequate safeguards for the protection of personal data are in place.

#### **(IV) Retention period of personal data**

The duration for which the Company retains shareholders' personal data, in the context of their shareholder status, is defined for the entire lifetime of the Company and in accordance with the applicable regulatory framework in force at any given time.

Personal data is retained by the Company for the time period prescribed by law and, more generally, for as long as is required under the applicable legislative and/or regulatory framework or required for the purpose of serving and safeguarding the Company's legitimate interests, for the exercise or defense of legal claims in the event of litigation, for the pursuit of the Company's claims, and for the fulfilment of its contractual obligations, and always in accordance with the applicable legal basis and the specific purpose for which the data is processed.

#### **(V) Measures for the protection and security of personal data**

The Company has incorporated into its systems, policies and internal procedures all technical and organizational measures aimed at ensuring the lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and confidentiality of processing. It is fully compliant with all principles governing the processing of shareholders' personal data, as provided for in the GDPR and the applicable legal framework in force at any given time. At the same time, the Company implements appropriate technical and organizational security measures within its systems and procedures, with the aim of safeguarding the confidentiality, integrity, and availability of personal data. These measures are also designed to protect data against unauthorized or unlawful processing, accidental loss, destruction or damage,

alteration, unauthorized disclosure or access, and, in general, any other form of improper processing

Furthermore, it is noted that, in the context of holding the Company's General Meetings remotely, the required videoconferencing is conducted using platforms that support security features. It is ensured that the link to the scheduled videoconference is adequately protected, and a thorough review of the terms of use and privacy policies is carried out when selecting a videoconferencing solution, in full compliance with the GDPR, Law 4624/2019, and the applicable legislation on the protection of personal data.

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

The Shareholder, as a data subject, retains the following rights under the GDPR, which may be exercised as applicable:

(a) **Right of access** to personal data concerning them, specifically, the right to know which personal data the Company holds and processes in relation to them, their origin, the purposes of such processing, the categories of data, and the recipients or categories of recipients (Article 15 GDPR).

(b) **Right to rectification** of inaccurate data as well as the right to complete incomplete data, so that they are accurate and up to date, by providing all necessary documentation evidencing the need for rectification or completion (Article 16 GDPR).

(c) **Right to erasure ("right to be forgotten")** of personal data, including, among other grounds, when there is no longer a valid reason for processing, subject to the Company's obligations and legal rights to retain such data in accordance with applicable legislative and regulatory provisions (Article 17 GDPR).

(d) **Right to restriction of 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, provided that there is no legal basis for retaining the data (Article 18 GDPR).

(e) **Right to data portability**, whereby the Shareholder has the right to receive the personal data concerning them, which they have provided to the Company, in a structured, commonly used and machine-readable format, or to request that such data be transmitted or transferred to another data controller, provided that the processing is based on consent and carried out by automated

means, and subject to the Company's legal rights and obligations to retain such data (Article 20 GDPR).

(f) **Right to object** to the processing of personal data concerning them, on grounds relating to the particular situation of the Shareholder, in cases where processing is carried out for the 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 that is made solely on the basis of automated processing, including profiling, if such decision produces legal effects concerning them or significantly affects them in a similar way, unless specific grounds apply in accordance with applicable legislation.

(g) In cases where processing is based on the Shareholder's prior explicit consent, the Shareholder retains the right to withdraw such consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

(h) **Right to file a complaint with the competent authority**, by which the Shareholder has the right to submit a complaint to the Personal 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 them, if they consider that their rights are violated in any way and that the processing of their data is carried out in violation of the applicable legislation, as well as the right to legal recourse.

It is further noted that the Company reserves the right, in any case, to refuse to satisfy a Shareholder's request, if, for example, the processing is necessary for the maintenance of shareholder status and/or the holding of voting rights, for the exercise of their rights as a Shareholder of the Company and/or as a holder of voting rights, as well as for the establishment, exercise, or defense of the Company's legal rights, the Company's compliance with its legal obligations, or the fulfilment of its obligations toward the Shareholders.

The Company shall, in any case, have the right to refuse the deletion of a Shareholder's personal data if such data is necessary for the purpose of maintaining the Company's historical Shareholder records, or if the processing or retention of such data is necessary for the establishment, exercise, or defense of its legal claims, or for the fulfilment of its obligations.

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

#### **(VII) Method of Exercising Data Subject Rights**

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

Refusal or undue delay by the Company in satisfying Shareholders' requests regarding the exercise of their rights entitles them to lodge a complaint with the Hellenic Data Protection Authority, as the competent supervisory authority for the application of the GDPR, as outlined above.

The Company, in accordance with its applicable data protection policy and within the context of the prevailing legal and regulatory framework, may revise or amend the present notice. The most up-to-date version will always be available on the Company's website at: <https://admieholding.gr/en/general-meetings/#>