

INFORMATION ON THE PROCESSING OF PERSONAL DATA INVESTORS REGISTERED IN THE AXIAsms-email INFORMATION SERVICE FROM PARTICIPANTS TO WHOM THEY HOLD AN INVESTOR'S SHARE AND ACCOUNT

A. INFORMATION TO DATA SUBJECTS

The public limited company named 'HELLENIC CENTRAL TITLE STORAGE COMPANY' (hereinafter referred to as "ATHEXCSD"), in its capacity as the controller of personal data, in the context of and in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter: "General Data Protection Regulation" or "GDPR"), the L. 4624/2019 and in general the applicable legislation on personal data protection, hereby provides the required information on the processing of personal data of natural persons who are registered investors in the Dematerialised Securities System (hereinafter referred to as "DSS") and are beneficiaries of information after having registered with the AXIAsms-email information service to eligible investors from a Participant in which they hold a share and an investor account. Hereinafter, for the purposes of this document, they shall be referred to collectively as "Individuals" or "Beneficiaries" and each of them as "Individual" or "Beneficiary". It is noted that the AXIAsms-email service is a mechanism for providing information to investors who hold a Share in the DSS on changes in the static elements of their Share and on changes in the composition of their portfolio in the DSS.

In the context of providing the above service, the ATHEXCSD, as a licensed Central Securities Depository, acts as a provider of Securities Information Service, and is subject to the relevant regulatory framework that determines the manner in which these services are provided.

It is noted that processing of personal data means any operation or set of operations which is performed, with or without the use of automated means, on personal data or on sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of making available, alignment or combination, restriction, erasure or destruction.

Following the above, the ATHEXCSD, in compliance with the principle of transparency, hereby informs Natural Persons, Information Users on the terms of processing of personal data concerning them.

I. What data we collect (Categories of personal data)

The personal data of Natural Persons collected and generally processed by ATHEXCSD in the context of providing information are the highly necessary, appropriate, relevant and are personal data limited to what is necessary for the purposes for which they are processed.

The main categories of personal data processed are listed by way of indication:

- α) contact data for the sending of information messages (e-mail address and/or mobile phone number).
- b) Data registered in the Beneficiary's DSS Account, as listed in Decision 4 of the Board of Directors of the ATHEXCSD (<https://athexgroup.gr/el/athexcsd-resolutions>).
- c) Data on changes in the composition of their portfolio in the DSS.

II. Where we collect your data (Source of personal data)

The above personal data are either collected by the Participant with whom the Beneficiary cooperates and through whom the registration in the AXIAsms-email Service was completed, or they are derived, following the initial registration of the Beneficiary in the service, from the DSS which is the system for maintaining securities accounts in the concepts of Regulation (EU) 909/2014 and Law 4569/2018, which is managed by ATHEXCSD in the context of providing its services as a Central Securities

Depository. ATHEXCSD receives from the Participants cooperating with the Beneficiaries the information that these Beneficiaries should register to the AXIASms-email service.

III. Why we collect your data and how we process it (Purpose and legal basis of processing)

ATHEXCSD processes the personal data of Natural Persons in accordance with the above and generally processes them for the fulfilment of legitimate processing purposes and always in accordance with valid legal bases that establish the lawfulness of such processing.

In particular, ATHEXCSD processes the personal data of Natural Persons for the purpose of providing information to Beneficiaries regarding changes in the details of their Units and changes in the composition of their portfolio held in the S.A.T., by sending the relevant information messages to the e-mail address and/or mobile phone number declared and registered in the DSS by the relevant Participants.

For the processing carried out in order to achieve the above purpose, the legal basis is that the processing is necessary for the performance of a task carried out in the exercise of a public authority entrusted to ATHEXCSD through the granting of a license to operate as a Central Securities Depository by the Securities and Exchange Commission under Regulation (EU) 909/2014 and Law 4569/2018.

It is noted that ATHEXCSD is responsible for processing only for the provision of the securities information service. For the registration of Beneficiaries to the service, the Controller is solely the Participant with whom the Beneficiary is working.

IV. Who are the recipients of personal data?

Access to the personal data of Natural Persons is only available to employees and executives of the ATHEXCSD, within the scope of their responsibilities and in the performance of the tasks assigned to them. The EL.K.A.T. shall not transmit, disclose or communicate personal data, except:

α) To natural and legal persons to whom the ATHEXCSD each time assigns the performance of specific tasks on its behalf, such as, inter alia, database management companies, companies storage and archive management, providers of telephone and postal services, development services, maintenance, configuration of IT applications, providers of e-mail services, internet hosting services, including cloud services (cloud services), lawyers and law firms, sworn auditors, lawyers and law firms.

b) To supervisory, auditing, independent, judicial, police, public and/or other authorities and bodies within the framework of their statutory competences, duties and powers (including but not limited to the Securities and Exchange Commission, Securities and Exchange Commission, Anti-Money Laundering Authority) when the transmission to them is required by law or provided for by law.

c) To the Participants with whom the Natural Person cooperates and through whom the Natural Person has completed his/her registration to the service, who act as independent controllers of the Natural Person's data.

ATHEXCSD has lawfully ensured that those who process personal data on behalf of the above, as processors of personal data, in accordance with the foregoing, meet all the conditions and provide adequate assurances for the implementation of appropriate technical and organizational measures, so that such processing meets the requirements of the GDPR and the applicable legal and regulatory framework and to ensure the protection of the rights of the data subjects.

V. Are the data transferred to countries outside the EEA (third countries) or to an international organisation?

There is no transfer of personal data collected for these purposes outside the European Economic Area (EEA)?

If a transfer to a third country or 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. For how long will the data be kept?

Personal data are kept by ATHEXCSD for the period of time specified by law and generally required by law and in accordance with the applicable legal and regulatory framework or required to serve and protect the legitimate interests of ATHEXCSD, for the exercise of claims and for the defence of ATHEXCSD in the event of litigation, for the pursuit of claims of ATHEXCSD and for the fulfilment of its contractual obligations and generally in accordance with the legal basis and purpose served by the processing.

VII. Rights of the subject of personal data

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

- α) Right of access to his/her personal data; a. Right of access to his/her personal data
- (b) The right to access his/her personal data; (b) The right to rectification and/or completion of his/her data
- (c) Right to have his/her data erased; (d) Right to have his/her data amended or supplemented; (e) Right to have his/her data corrected or supplemented
- (d) Right to have the processing restricted
- (e) Right to object to the processing of data

VIII. Exercise of Rights

In order to exercise the above rights under VII, Natural Persons may address to ATHEXCSD by physical mail to: Data Protection Officer (DPO) or by e-mail to the Data Protection Officer (DPO) of the Athens Exchange Group at the e-mail address dataprotectionofficer@athexgroup.gr.

The DPO shall respond to requests to exercise the above rights within one (1) month from the date of receipt of the request. However, if the request is complex or there are a large number of requests under consideration, it will inform within the month if it is necessary to grant an extension of another two (2) months within which it will respond.

IX. How are the rights of natural persons protected?

ATHEXCSD has an information security management system in place to ensure the confidentiality, security of data processing and protection against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, and any other form of unlawful processing. ATHEXCSD has taken appropriate organisational and technical measures to ensure the security and protection of personal data against any form of accidental or unlawful processing, and its specifically authorised staff who process personal data have received appropriate training, guidance and information.

X. Submission of complaints

If the Natural Person considers that a request has not been adequately and lawfully satisfied or that his/her right to the protection of his/her personal data is violated by a processing carried out by the Company, he/she has the right to submit a complaint to the Personal Data Protection Authority (postal address: Kifissia 1-3, P.C. 115 23, Athens, Greece, <https://www.dpa.gr/>, tel. 210 6475600, e-mail: contact@dpa.gr)

B. CONTACT DETAILS OF THE CONTROLLER

Hellenic Central Securities Depository, Hellenic Central Securities Depository SA

Address: 110 Athinon Avenue, 104 42 Athens

Contact telephone: +30 210 33 66 800

email: protocol@athexgroup.gr

email DPO: dataprotectionofficer@athexgroup.gr