



INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE SHAREHOLDERS OF PPC S.A.

The Société Anonyme under the trade name "Public Power Corporation" which has its registered seat in Athens, 30, Chalkokondyli st., TIN No: 090000045, Tax Office: Commercial Companies Tax Office (hereinafter "PPC S.A.") in its capacity as data controller and in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council dated 27 April 2016 (hereinafter referred to as "General Data Protection Regulation" or "GDPR"), the Law 4624/2019 and in general pursuant to the applicable legislation on the protection of personal data, the required information is hereby provided on the processing of personal data of the natural persons who are or have been registered shareholders of PPC, who each time bear the capacity of PPC's shareholders, their legal representatives and representatives of the shareholders, as well as secured creditors of the shareholders, whoever has a voting right and in general holds or/ and exercises rights on the shares of PPC, their representatives, those exercising voting rights by representing legal entities, as well as those participating in any capacity in the General Meetings of PPC S.A. (hereinafter and for the purposes of this information all the abovementioned categories of natural persons will be jointly referred to as "Shareholders" and each of them as "Shareholder"), who bear the capacity of data subjects.

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, to personal data or to sets of personal data, such as collection, recording, organization, structure, storage, adaptation or alteration, retrieval, information retrieval, use, disclosure by transmission, dissemination or any other form of making available, correlation or combination; restriction, erasure or destruction.

PPC, as issuer of the shares, shall proceed to the processing of the personal data of Shareholders, in compliance with the provisions of the GDPR and the relevant national legislation (L. 4624/2019) and the EU 596/2014, i.e. of the abovementioned natural persons, in the aforementioned capacities, for legal and legitimate purposes, observing the principles of fair and transparent processing, applying the appropriate technical and organizational measures, acting in compliance with the requirements of the GDPR, as well as 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 data subjects.

Following the above, PPC in compliance with the principle of transparency and the requirements of articles 13-14 of the GDPR, hereby informs the Shareholders about the terms of their personal data processing.

(I) What personal data are subject to processing by PPC and where they are collected from

The personal data of the Shareholders collected and processed by PPC S.A. in the context of the operation and servicing of the shareholder relationship are necessary, appropriate and relevant to the purposes of the processing and is limited to what is necessary in relation to the purposes for which it is processed.

The main categories of personal data concerning Shareholders which are processed by PPC S.A. include but not limited to the following:

(a) Identification data and identification documents, such as name and surname, father's name, spouse's name, date of birth, number and copy of identity card or passport or other equivalent document, tax identification number, competent Tax Office, country of tax residence, any special tax treatment, profession/activity, citizenship and other demographic data.

(b) Contact information such as postal and e-mail address, landline and mobile telephone number.

(c) Number and class of shares.

(d) Investor Share Code Number in the Dematerialized Securities System (DSS), Securities Account held in the Dematerialized Securities System (DSS), Shareholder Register Number.

(e) Correspondence data with Shareholders concerning contact details, as well as the content of any existing electronic correspondence, letters, inquiries and answers.

(f) Data relating to the capacity based on which the Shareholder participates in the General Meeting of PPC S.A. and the relevant supporting documents, details of the shares and of any rights held thereon, information regarding any share trading activity.

(g) Data relating to the participation and the exercise of voting right of Shareholders in the General Meeting of PPC S.A., information on any requests addressed to PPC S.A. from time to time, signatures of Shareholders and in general any other information in the context of the application of the provisions in force from time to time for the financial instruments markets.

The above personal data is collected either directly by the Shareholders for the performance of tasks concerning them—who shall also ensure that their data is updated, so that the Shareholder Register remains always up-to-date and accurate—or by third parties authorized by the Shareholders, or by the société anonyme under the trade name "Hellenic Central Securities Depository S.A." (ATHEXCSD), which, in its capacity as operator of the Dematerialized Securities System (DSS), maintains the identification data of Shareholders, as well as any other information concerning PPC's shareholder structure, any transactions on the shares and is brought to the attention of PPC S.A. through electronic files, in accordance with the provisions of the applicable legislation and the Regulation of the Dematerialized Securities System (DSS).

(II) What are the purposes of data processing

PPC S.A. shall collect the personal data of Shareholders, according to those mentioned above and in general processes them, in order to fulfil the legitimate purposes of processing, always according to valid legal bases that establish the lawfulness of such processing.

In particular, PPC S.A. processes the personal data of Shareholders in order to:

- (a) Identify the Shareholder.
- (b) Communicate with the Shareholder.
- (c) Verify the possibility and legality of exercising Shareholders' rights, pursuant to the applicable legislation, as well as facilitate the Shareholders to exercise their rights by virtue of the law (including, but not limited to, the exercise of the right of participation and vote and in general the exercise of the rights of the Shareholders in the General Meetings, shareholder capacity confirmation, drawing up of a shareholders' list, keeping minutes of the General Meeting, participation in corporate transactions, dividend distribution).
- (d) Perform corporate actions (e.g. dividend distribution, share capital increase etc.), disclose transactions of liable persons to the Athens Stock Exchange, monitor transactions on PPC's shares.
- (e) Perform PPC's contractual obligations towards Shareholders (e.g. dividend distribution and payment) and in general fulfil PPC's obligations towards Shareholders.
- (f) Comply with its legal obligations
- (g) Fulfil and support legal rights, defend and service its legitimate interests (in the context of legal claims of PPC S.A.), unless such interests are overridden by the interests or fundamental rights and freedoms of the data subjects which require personal data protection.
- (h) Fulfil the obligations arising from provisions of tax legislation and other provisions of the mandatory law.
- (i) Maintain and manage the data of PPC 's Shareholders Registry, which is fed by data issued by the ATHEXCSD.
- (j) Publish acts and data of PPC S.A. in the General Commercial Registry (G.E.MI.), the Athens Stock Exchange or on the website of PPC S.A., when required by law.
- (k) Respond to requests of the Shareholders, process requests made by Shareholders in the context of the services provided by PPC S.A. (e.g. issuance of certificates), provide answers and clarifications on specific inquiries or requests addressed to PPC S.A. by the Shareholders.
- (l) Keep a Shareholders' record.

(III) Who are the Personal Data Recipients

Access to the personal data of Shareholders is only available to PPC 's employees and executives, within the scope of their responsibilities and during the execution of the duties assigned to them and in particular to those who are competent for Shareholders' identification and for controlling the lawful exercise of their rights.

PPC S.A. shall not transfer, communicate or disclose the personal data of Shareholders to any person other than:

(a) Natural persons and legal entities to which PPC S.A. assigns the performance of specific tasks on its behalf, such as, inter alia, providers of technical and support services, database management companies, records storage and management companies, postal service providers, providers of services related to the development, maintenance and configuration of IT applications, e-mail service providers, web hosting service providers including cloud services and in general service providers, lawyers, law firms, accountants, chartered auditors-accountants or audit firms, external advisors and partners of PPC S.A..

(b) The societe anonyme under the trade name "Hellenic Central Securities Depository S.A..".

(c) Supervisory, auditing, tax, independent, judicial, police, public and/or other authorities and bodies within the scope of their statutory competencies, duties and powers (including but not limited to the Bank of Greece, the European Central Bank, the Hellenic Capital Market Commission, the Athens Stock Exchange, the Anti-Money Laundering Authority, the Deposits and Loans Fund, the General Commercial Registry).

(d) Natural persons or legal entities since this transfer is provided for by law or judicial decision.

PPC S.A. has duly ensured that any data processors, acting on its behalf, under the above, shall meet all requirements and provide sufficient guarantees with regard to the implementation of appropriate technical and organizational measures in such manner so that the said processing meets the requirements of the GDPR and in general of the applicable legal and regulatory framework and shall ensure the protection of the rights of data subjects.

In the event that any transfer of personal data to third countries (i.e. to countries outside the European Economic Area (EEA)) or to international organizations is required, such transfer and in general any processing shall be carried out in compliance with the GDPR and in general with the legal framework with regard to the protection of personal data and only on condition that requirements are met and the provisions of GDPR are applied with a view to ensuring that the level of protection of natural persons guaranteed by the GDPR is not undermined and that sufficient safeguards are provided for the protection of personal data.

IV) Data retention period

Personal data shall be retained by PPC S.A. for the period of time as set out by law and in general as required by law and according to the legal and/or regulatory framework in force or required to serve and protect the legitimate interests of PPC S.A. or the legal rights of Shareholders, for the exercise of claims and for the defence of PPC S.A. in case

of litigation, for the pursuit of claims of PPC S.A., as well as for the fulfilment of its contractual obligations, in general in accordance with the applicable legal basis and the purpose of its processing.

V) Personal data protection and security measures

PPC S.A. has incorporated into its systems, policies and internal procedures all the technical and organizational measures aimed at safeguarding the legality, objectivity of processing, transparency, limitation of purpose, minimization, accuracy, data storage period limitation, integrity and confidentiality and is in full compliance with all principles governing the processing of personal data of Shareholders, as provided for in the GDPR and the applicable legal framework.

At the same time, PPC S.A. implements the appropriate technical and organizational security measures in its systems and procedures, with the aim of protecting the confidentiality, integrity and availability of personal data, as well as of protecting personal data against unauthorized or unlawful processing, accidental loss, destruction or damage, alteration, unauthorized dissemination or access and in general any form of unlawful processing.

VI) Rights of data subjects

Shareholders, as data subjects, shall reserve the following rights, according to the GDPR, which may be exercised on a case- by-case basis:

(a) **Right of access** to personal data concerning them, and in particular the right to know which personal data concerning them, are kept and processed by PPC S.A., their origin, as well as the purposes of such processing, the categories of personal data, the recipients or categories of recipients (article 15 of GDPR).

(b) **Right to rectification** of inaccurate personal data, as well as the right to have data completed if found to be incomplete, by submitting any necessary documentation evidencing the need for data completion or rectification (article 16 of GDPR).

(c) **Right to erasure (right to be forgotten)** of personal data, when inter alia, there are no valid grounds for processing, subject to the PPC's obligations and legal rights to retain it, pursuant to the applicable laws and regulations (article 17 of GDPR).

(d) **Right to restrict processing** either because the accuracy of the personal data is contested, or because the processing is unlawful or the purpose of the processing has ceased to exist, provided that there are no legitimate grounds for retaining the data(article 18 of GDPR).

(e) **Right to object to and oppose the processing** of their personal data on grounds relating to the particular situation of the Shareholders in case the processing is carried out based on legitimate interest pursued by PPC S.A. or by any third party, or for the performance of a task carried out for reasons of public interest or during the exercise of official authority (article 21 of GDPR).

Furthermore, the Shareholder, as data subject, has the right to object to a decision of PPC S.A. made solely on the basis of automated processing, including profiling, if it produces legal effects concerning him/her or significantly affecting him/her in a similar

way, unless special reasons occur according to the applicable legislation (article 22 of GDPR).

(f) In the event that data processing is based on the prior explicit consent of the Shareholder, the latter shall have **the right to withdraw at any time his/her consent**, without prejudice to the lawfulness of processing which was based on his/her consent, prior to its withdrawal.

(g) **Right to lodge a complaint with the competent authority**, whereby the Shareholder shall have the right to lodge a complaint with the Hellenic Data Protection Authority (www.dpa.gr), which is the competent supervisory authority for the protection of the fundamental rights and freedoms of natural persons, in relation to the processing of data concerning him/her, if he/she considers that his/her rights are infringed in any way whatsoever and that the processing is in violation of the applicable legislation. He shall also have the right to take legal action.

Furthermore, it shall be noted that PPC S.A. shall have, in any way, the right to refuse to comply with a Shareholder's request if, inter alia, the personal data processing is necessary for retaining the shareholder capacity and/or holding his/her voting right, for exercising his/her right as Shareholder of PPC S.A. and/or exercising his/her voting right, as well as for establishing, exercising or defending its legal rights, for the compliance with its legal obligations or for the fulfilment of its obligations towards Shareholders.

(h) **Other rights provided for in the GDPR.**

PPC S.A. reserves in any case the right to deny the erasure of the Shareholder's personal data if such personal data is essential for the purpose of maintaining the Shareholder record and if the processing or retention of such data is necessary for the establishment, the exercise and the defence of PPC's legal rights or the fulfilment of PPC's obligations.

VII) Mode of exercise of data subjects' rights

Any request of the Shareholder relating to his/her personal data that is subject to processing by PPC S.A., as well as relating to the exercise of his/her rights shall be submitted in writing to PPC S.A. and sent at the following e-mail address cass@ppcgroup.com or delivered_ to the Shareholder Service Unit at the following address: 30, Chalkokondyli st., GR-104 32 Athens.

Failure or undue delay of PPC S.A. to respond to the requests of the Shareholders, during the exercise of their shareholders' rights, shall give them the right to file a complaint with the Hellenic Data Protection Authority, the competent Supervisory Authority for the implementation of the GDPR, as mentioned hereinabove.

PPC S.A., based on its current data protection policy and in the context of the legislative and regulatory framework in force at any time, may revise or amend the present information, the updated version of which will always be available on the website <https://www.ppcgroup.com>.