

## Privacy Notice regarding data processing

### 1.1 Introduction

We would like to assure you that for the Company TERNA S.A. and the GEK TERNA Group as a whole, it is of paramount importance to protect the personal data of natural persons who transact in any way with the company. For this reason, we take appropriate measures to protect the personal data we process and to ensure that their collection and processing is always carried out in accordance with the obligations set by the General Data Protection Regulation (EU 2016/679) and the applicable Greek legislation (hereinafter "applicable legislation").

### 1.2 Data Controller – Data Protection Officer (DPO)

The Company TERNA S.A. (hereinafter referred to as the "Company"), in her capacity as Data Controller, informs that, for the purposes of carrying out its business activities, it processes personal data concerning natural persons, which allow them to be identified. In particular, the Company processes data relating to (indicatively) customers, Workers and prospective employees, suppliers and external Partners, its shareholders and investors), in accordance with the applicable legislation

For any issue regarding the processing of personal data please contact the Data Protection Officer (DPO) directly, at the following email: [dpo@gekterna.com](mailto:dpo@gekterna.com)

### 1.3 What personal data do we process?

The Company processes only the absolutely necessary personal data, depending on the nature of the relationship it maintains with each natural person. Indicatively, personal data that may be collected and processed include:

- **Identification details**, such as full name, VAT number, ID number or passport number, professional capacity, date of birth.
- **Contact information**, such as home or business address, telephone number, email.
- **Financial and tax information**, such as bank details (IBAN), invoices, fees, payment receipts, income statements, insurance/tax obligations.
- **Data related to a contractual or cooperative relationship**, such as contract details, signed annexes, details of subcontractors or legal representatives.
- **Data of professional nature**, such as CV, studies, experience, work permits, IKA/AMKA registration number, salary data, evaluations.
- **Online activity data**, such as system logs, IP addresses, cookies, browsing data on the Company's website, when applicable.

- **Image and audiovisual data**, collected through video surveillance systems (CCTV) within the premises, where there is appropriate signage and in accordance with our specific CCTV Privacy notice.

## **2. What are the lawful grounds for processing personal data?**

The processing of your personal data by the Company is based on one or more of the following legitimate grounds:

- **Performance of a contract:** When the processing is necessary for the performance of a contract to which you are a party or for the taking of measures at your request prior to the conclusion of a contract, such as the execution of a project, the provision of services, employment, submission of a CV, commercial cooperation, etc., in order to fulfill our contractual obligations in the above context.
- **Safeguarding legitimate interests:** When the processing is necessary for the purposes of legitimate interests of the Company or a third party, unless the rights and freedoms of the subject prevail, such as facility security (CCTV), fraud prevention, defense of the Company's legal claims, internal audits, improvement of procedures, etc.
- **Compliance with a legal obligation:** When the processing is required for compliance with legal obligations arising from national or EU law, such as disclosure obligations of a S.A., submission of data to supervisory authorities, compliance with tax, labor or insurance obligations, notifications to the Stock Exchange or the Hellenic Capital Market Commission, etc.
- **Consent** that -if any- you provide under the specific conditions set by the applicable legislation

The Company ensures that consent, where required, is freely provided, is clear, specific and up-to-date, and you can revoke it at any time, without affecting the lawfulness of the processing based on it until the withdrawal.

## **3. How and why do we use your personal data?**

- **Fulfilment of contractual and pre-contractual obligations**  
This includes the management of works, supply, subcontracting or service contracts, the execution of payments, invoicing, the modification of contractual terms and the overall management of the business relationship.

- **To carry out communication between us**, among other things to manage and respond to questions and other requests you submit through the special contact form on our website (link to this communication channel)
- **To comply with legal obligations**. This includes disclosure obligations to public and supervisory authorities, ex. the publication of shareholder data in the General Commercial Registry, compliance with the provisions of the stock exchange legislation, (ex. details of shareholders-natural persons), when required to disclose significant holdings to the Hellenic Capital Market Commission, compliance with the provisions of the Capital Market Commission, tax and labor legislation.
- **For the safeguarding of our legitimate interests and the protection of persons and property**. When we use closed circuit television (CCTV) and security cameras in order to be able to protect the safety of individuals, materials and the company's facilities.

#### **4. To whom and where do we communicate personal data?**

The Company may transfer personal data to third parties, in the context of its lawful activities, when this is necessary to serve a specific processing purpose or when provided for by law.

Depending on the case, the recipients may be:

- **Processors**: Third parties to whom the Company assigns the processing of personal data on its behalf, indicatively: hosting and IT support providers, accounting or legal offices, security or cleaning companies, technical consultants, subcontractors and external partners for project execution.

In these cases, the Company remains the **Data Controller** and ensures that it enters into a **processing contract** with these partners that ensures that the data is handled lawfully and securely.

- **Other Data Controllers**: There are cases where personal data are transferred to third parties acting **autonomously** as Data Controllers, indicatively: banks, insurance companies, public authorities (tax, insurance, regulatory, judicial), companies of the same group, if required operationally or legally. In these cases, each organization processes the data in accordance with its own privacy policies and legal obligations. The Company ensures that any transfer of data is carried out only to the extent necessary and in accordance with applicable legislation.

- **In third countries where the company does business**

Please note that the processing of your personal data takes place within the European Union. However, the Company may transfer data of some of its employees or external partners outside the European Union, if this is required based on the specific duties they have undertaken in the context of our professional relationship (ex. taking up duties on construction sites outside the EU). In these cases, the transfer will only be carried out to countries that guarantee adequate protection to the interested party based on a decision of the European Commission and/or in accordance with the adequate guarantees provided by EU Regulation 679/2016 on a case-by-case basis.

## **5. Storage Period**

The data storage period is decided on the basis of the following specific criteria depending on the case:

- Where processing is required as an obligation by provisions of the applicable legal framework, your personal data will be stored for as long as required by the relevant provisions.
- Where the processing is carried out on the basis of a contract, your personal data is stored for as long as it is necessary for the performance of the contract and for the establishment, exercise, and/or support of legal claims under the contract.
- Where processing is based on consent, the data is retained until the consent is withdrawn and/or for as long as required by the nature of the purpose of the processing.

After the above period of time, the data are deleted and/or anonymized in a secure and documented manner, unless their further retention is required or permitted by the applicable legal framework.

## **6. What are your rights with respect to your personal data?**

Any natural person whose data is processed by the company enjoys the following rights:

### **Right of access:**

You have the right to be aware and verify the legitimacy of the processing. So, you have the right to access the data and get additional information about how your data is processed.

**Right to rectification:**

You have the right to study, correct, update or modify your personal data by contacting the Data Protection Officer (DPO).

**Right to erasure:**

You have the right to submit a request for the deletion of your personal data under the restrictions provided in the cases of article 17 of the Regulation.

**Right to restriction of processing:**

You have the right to request restriction of the processing of your personal data in the following cases: (a) when you contest the accuracy of the personal data and until verification is carried out, (b) when you oppose the deletion of personal data and request instead of deletion the restriction of their use, (c) when the personal data is not needed for the purposes of processing, but is nevertheless necessary for you to establish, exercise or support of legal claims, and (d) where you object to processing and until it is verified that there are legitimate grounds concerning us that override your grounds for objecting to the processing.

**Right to object to processing:**

You have the right to object at any time to the processing of your personal data in cases where, as described above, it is necessary for the purposes of legitimate interests pursued by us as controllers.

**Right to portability:**

You have the right to receive your personal data free of charge in a format that allows you to access, use and process them by commonly used processing methods.

You also have the right to ask us, if technically feasible, to transfer the data directly to another controller. This right exists for the data you have provided to us, and their processing is carried out by automated means based on your consent or in execution of a relevant contract.

**Right to withdraw consent**

Where processing is based on your consent, you have the right to withdraw it freely, without affecting the lawfulness of the processing based on your consent before you withdraw it.

In order to exercise any of the above rights, you can contact the Data Protection Officer (DPO) email: [dpo@gekterna.com](mailto:dpo@gekterna.com)

## **Right to complain to the Hellenic Data Protection Authority**

If you exercise one of your rights and it is not met, you have the right to lodge a complaint with the Personal Data Protection Authority through its portal (<https://eservices.dpa.gr/>). For more information, you can consult the website of the Hellenic Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)).

## **7. Security of Personal Data**

The Company implements appropriate technical and organizational measures aimed at the secure processing of personal data and the prevention of accidental loss or destruction and unauthorized and/or illegal access to, use, modification or disclosure thereof. In order to ensure the appropriate level of security against risks and to select the appropriate technical and organizational measures, the company takes into account the latest technological and other developments, the cost of implementation, the nature, context and purposes of the processing, as well as the likelihood and risk of incidents of accidental loss or destruction and unauthorized and/or illegal access to personal data taking place; use, modification or disclosure of them, and on the other hand how serious the consequences will be for the rights and freedoms of natural persons.

## **8. Changes to the Personal Data Processing Notice**

This update reflects the Company's current policy regarding the processing of personal data, as it applies at the time of its publication.

The Company may amend or update this information if there are material changes in its processing activities, relevant legislation or business procedures.

Last reviewed: September 2025