

PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA
OF THE SHAREHOLDERS OF “GEK TERNA S.A.” AND
OTHER PARTICIPANTS IN THE REMOTE
SHAREHOLDERS GENERAL MEETING OF
“GEK TERNA S.A.”

The société anonyme (S.A.) company under the name “**GEK TERNA S.A.**” having its registered office at 85 Mesogeion Avenue, 11526 Athens, Greece, with Tax Identification Number (TIN) 094005751 and General Commercial Registry (GEMI) number 000253001000. (hereinafter referred to as “**GEK TERNA**”), in its capacity as the data controller of personal data in the context and in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as “**General Data Protection Regulation**” or “**GDPR**”), the Law 4624/2019 and in general according to currently applicable legislation in force with regard to the protection of personal data (hereinafter the “**applicable legislation**”), shall hereby provide the required following information on the processing of the personal data to the following natural persons, in their capacity as data subjects, who participate in the remote General Meeting of **GEK TERNA S.A.**:

- 1) natural persons who are or were registered shareholders of **GEK TERNA**, of those who have the capacity of the shareholder of **GEK TERNA**, of their representatives, anyone who has voting right over the shares, and in general derives or/and exercises rights over the shares of **GEK TERNA**, their representatives, of those who exercise the voting right by representing legal entities as well as of those who participate, under any capacity, to the Annual General Meeting of Shareholders that will take place remotely in real-time via teleconference as well as any repeat meeting thereof (hereinafter, for the purposes of the present, all the above categories of natural persons will be jointly referred to as “**Shareholders**” and each of them as “**Shareholder**”).
- 2) the natural persons (other than the **Shareholders**), who will participate in teleconference (video conference) of the remote General Meeting, such as Members of the Board of Directors of **GEK TERNA**, executives of **GEK TERNA**, auditors and other third parties, that it processes the respective personal data, which are collected directly by the data subjects in question, for the purposes of the legitimate interests pursued by **GEK TERNA** for said processing.

*(hereinafter, categories of natural persons (1) and (2) shall be collectively referred to as the “**natural persons**”)*

It shall be noted that processing 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, organization, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

GEK TERNA, in its capacity as data controller, , legally processes the personal data of the of all natural persons participating in the General Meeting”, under the aforementioned capacities, always for legitimate and fair purposes, following the principles of lawful, fair and transparent processing, applying the appropriate technical and organizational measures, in compliance with the applicable legislation as well as the applicable legal framework governing sociétés anonymes, , always having as a guide and primary concern the safeguarding and protection of personal data and the fundamental rights of data subjects.

Following the above and in compliance with the principle of transparency, **GEK TERNA** hereby provides information to the aforementioned natural persons regarding the terms and conditions of the processing of their personal data.

I. What kind of personal data do we collect?

1. Shareholders

The personal data of the **Shareholders** which are collected and processed by **GEK TERNA** in the context of the operation and service of the shareholder capacity and in order to carry out the tasks required under

the shareholder relationship are the most necessary, adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Indicatively the main categories of personal data concerning the Shareholders and which the GEK TERNA processes for legitimate purposes of processing, are the following:

- a) Identification data, such as name and surname, father's name, identity card number or passport number or other equivalent document, tax identification number, profession, citizenship.
- b) Contact information such as: postal and e-mail address, fixed and/or mobile telephone number, etc.
- c) Number and type of shares.
- d) Investor Share Code Number in the Dematerialized Securities System (DSS).
- e) Data relating to the capacity under which the Shareholder participates to the General Meeting and the relevant supporting documentation.
- f) Correspondence and communication data.
- g) Data relating to the participation and the exercise of the voting right of the Shareholder in the General Meeting of GEK TERNA (e.g. voting, requests submitted to GEK TERNA) (signature of the Shareholders and in general any information which is required in the context of implementing the current rules on financial instruments markets.
- h) Audio and visual data (audio and visual recording), in the event that the Shareholder takes the floor or appears via camera during the General Meeting held by teleconference. Technical connection data on the electronic participation platform (e.g. user ID, access credentials to the electronic platform <https://axia.athexgroup.gr>, IP address), solely for the purposes of identification and ensuring participation.

2. Other Natural Persons

GEK TERNA processes the following personal data of natural persons, other than Shareholders, who will participate in the remote General Meeting via video conference, such as members of the Board of Directors of GEK TERNA, its senior executives, auditors and other third parties. These data are collected directly from the respective data subjects, for the purposes of the legitimate interests pursued by GEK TERNA in the context of said processing:

- a) Identification data, such as full name, father's name, identity card, passport or other equivalent document.
- b) Data related to the capacity under which such persons are entitled to participate in the General Meeting.
- c) Email address and mobile phone number, for the purpose of enabling the individual's participation in the video conference.
- d) Audio and visual data (e.g. audio and/or video recording), in the event the individual takes the floor or appears via camera during the General Meeting held by teleconference.
- e) Technical connection data on the electronic participation platform (e.g. user ID, access credentials to the electronic platform <https://axia.athexgroup.gr>, IP address), solely for identification and participation security purposes.

II. Sources of collection of your personal data

The above personal data are collected either directly from the natural persons for the performance of matters concerning them—either from third persons authorized by the natural persons, either - in relation to the Shareholders' data- from the société anonyme under the name "EURONEXT SECURITIES ATHENS A.E.", which, at its capacity as operator of the Dematerialized Securities System (DSS), keeps the details of identification of the Shareholders as well as other information related to GEK TERNA's shareholder structure, any transactions on the shares and are provided to GEK TERNA through electronic records, according to the provisions of the legislation in force and the Regulation of the Dematerialized Securities System (DSS).

Specifically with regard to Shareholders, it is noted that they are responsible for ensuring the accuracy and updating of their personal information, so that the Shareholders' Register remains fully accurate and up to date.

III. Why do we collect your data and how do we process them?

GEK TERNA collects the personal data of the Shareholders and other natural persons that will participate in the General Meeting, as above mentioned, and in general processes them, for the fulfillment of legitimate purposes of processing and always according to valid legal basis which establish the lawfulness of the processing. Specifically, GEK TERNA processes the personal data of the natural persons in order:

- a) To identify the natural person.
- b) To communicate with the natural person.
- c) To verify the possibility and legality of exercising natural persons' rights, especially the Shareholders, in accordance with the Greek legislation governing the operation of sociétés anonymes, indicatively exercise of the right of participation and voting right and in general exercise of the rights of the Shareholders in the General Meetings, shareholder confirmation, drawing up a shareholders' list, keeping minutes of the General Meeting, participation to corporate actions (i.e. dividend distribution, share capital increase etc.).
- d) To disclose transactions of liable individuals to EURONEXT ATHENS, to monitor transactions on GEK TERNA's shares.
- e) To perform GEK TERNA's contractual obligations (i.e. dividend distribution, towards the Shareholders) and in general to fulfill GEK TERNA's obligations towards the Shareholders.
- f) To comply with legal obligations.
- g) To fulfill and support legal rights, to protect and service the legitimate interests of GEK TERNA (such as in case of legal claims of GEK TERNA), except where such interests are overridden by the interests or fundamental rights and freedoms of the natural persons, as the data subjects, which require protection of personal data.
- h) To fulfill the obligations arising from provisions of tax legislation and other compulsory provisions.
- i) To manage and maintain the Shareholder Register, in accordance with the applicable legal provisions.
- j) To publish acts and information of GEK TERNA in the General Commercial Registry (G.E.M.I.), the EURONEXT ATHENS or on the website of GEK TERNA, as required by law.
- k) To respond to requests of the natural persons, carry out requests of the natural persons in connection with the services provided by GEK TERNA (e.g. issuance of certificates), to provide replies and clarifications to specific inquiries or requests addressed to GEK TERNA by the natural persons.
- l) To keep an archive of GEK TERNA's shareholders.

IV. Who are the recipients of the personal data?

Access to the personal data of the above natural persons shall be awarded only to the GEK TERNA's employees, within the range of their responsibilities and in the exercise of the duties assigned to them and specifically those who are responsible for Shareholders' identification and for reviewing the lawful exercise of their rights.

GEK TERNA shall not transmit or disclose the personal data except in case to:

- a) Natural persons and legal entities, to which GEK TERNA assigns the execution of certain tasks on its behalf under the condition of confidentiality, such as, inter alia, database management companies, file storage and recordkeeping companies, postal services providers, providers of services related to the development, maintenance and customization of IT applications, e-mail services providers, companies providing webhosting services (including cloud services) lawyers, law firms, chartered accountants or audit firms.
- b) The société anonyme under the name "EURONEXT SECURITIES ATHENS A.E.", to which GEK TERNA has assigned, as the processor on behalf of GEK TERNA, the organization of the remote General Meeting which is conducted via the electronic platform <https://axia.athexgroup.gr>, through which they will be provided with the opportunity to participate in and vote remotely at the General Meeting, as well as any sub-processors (further processors) the processing for the société anonyme under the name "EURONEXT SECURITIES ATHENS A.E." (such as the company Zoom Video Communications, Inc, which provides the ZOOM tool / services team with which video conference is provided through cloud services) which is maintained within the European Economic Area (E.E.A.)
- c) Supervisory, audit, tax, independent, judicial, police, public and/or other authorities and bodies within the

scope of their statutory tasks, duties and powers (i.e. Hellenic Capital Market Commission, Financial and Economic Crime Unit, Greek Financial Intelligence Unit).

- d) Other shareholders, as appropriate, in accordance with the applicable Greek legislation governing the operation of sociétés. GEK TERNA informs the Shareholders that, pursuant to Article 131 (regarding the method of voting at the General Meeting), paragraph 2 of Law 4548/2018, remote voting is open and the exercise of the voting right by the Shareholder, as well as the content of their vote, may, upon request, be disclosed to the other Shareholders participating in the General Meeting..

GEK TERNA has lawfully ensured that any processors of personal data, acting on its behalf, according to the above mentioned, shall meet all requirements and provide sufficient guarantees to implement appropriate technical and organizational measures in such a manner that such processing will meet the requirements of the GDPR and in general of the applicable legislative and regulatory framework and ensure the protection of the rights of the data subjects.

V. Are the data transferred outside the European Economic Area (E.E.A.) or to international organizations?

GEK TERNA may transfer natural persons' personal data to countries outside the E.E.A. (third countries) or in international organizations under the following circumstances:

- a) when the European Commission has issued an implementing act for the adequacy of personal data protection level within that third country, or the international organization.
- b) when the natural person has been specifically informed and has given her/his express consent to GEK TERNA, provided also that the other conditions laid down in the legislative framework are met,
- c) where the transfer is necessary for the execution of contractual obligations,
- d) where the transfer is necessary for the establishment, exercise or support of legal claims or the defense of GEK TERNA's legal rights,
- e) where the transfer is necessary under a statutory provision or a transnational convention or an international convention, or
- f) for the purposes of the GEK TERNA's compliance with rules relating to automatic exchange of information in the taxation area, as those are provided for by the statutory and regulatory framework.

In order to fulfill the obligations under points e) or f) above, GEK TERNA may transfer shareholder's personal data to the competent national authorities, in order for them to forward these data to the relevant authorities of third countries.

In any case, GEK TERNA ensures that any such transfer is carried out in accordance with the provisions of the GDPR, implementing appropriate safeguards to ensure an adequate level of protection of personal data and full compliance with the applicable legal framework.

VI. For how long is the data retained?

Personal data are retained by GEK TERNA for as long as required by the applicable legislation, including Greek legislation governing the operation of sociétés anonymes (S.A. companies), as well as for as long as necessary for the purposes of serving its legitimate interests, exercising or defending legal claims, pursuing entitlements, or fulfilling its legal and contractual obligations.

VII. Rights of natural persons as data subjects

According to the applicable legislation, the personal data subject has the following rights, which may be exercised on case-by-case basis:

- a) To know which personal data, concerning her/him, are being stored and processed by GEK TERNA, their source as well as the purposes of the processing, the categories of the personal data, the recipients or categories of recipients (right of access).
- b) To request for the rectification and/or supplementation of this personal data, so as to be complete and accurate, by submitting any necessary document which shows the need for supplementation or rectification (right to rectification).

- c) To request the restriction of processing concerning her/his personal data, among others, when the accuracy of the personal data is contested or the processing is unlawful or the purpose of the processing was eliminated and provided that there is no legitimate reason to retain them (right to restriction of processing).
- d) To deny and/ or object to any further processing of her/his personal data retained by GEK TERNA (right to object).
- e) To request for deletion of her/his personal data from GEK TERNA's records, when inter alia, there is no longer valid purpose of processing, subject to GEK TERNA's obligations and legal rights to retain them, pursuant to the current applicable laws and regulations (right to be forgotten).
- f) To request for the transfer of the data she/he has provided to GEK TERNA, in a structured, commonly used and machine-readable format or has the right to ask to transmit those data to another controller, provided that the processing is based on consent and is carried out by automated means and subject to GEK TERNA's legal rights and obligations to retain the personal data (right to data portability).

GEK TERNA has, in any case, the right to refuse the satisfaction of natural person's request if, indicatively, the personal data processing is necessary for example the retention of subject's capacity as a Shareholder and/or the possession of her/his voting right, for the exercise of her/his rights, in the context of participation in the General Meeting, as well as in case they are necessary for the establishment, exercise or defense of GEK TERNA's rights, the compliance of GEK TERNA with its legal obligations or the fulfilment of GEK TERNA's obligations towards the natural persons participating in the General Meeting

GEK TERNA reserves in any case the right to deny the deletion of natural person's personal data if such personal data is essential for the purposes of maintaining for example the archive of the GEK TERNA's shareholders (pursuant to the aforementioned Section III.I), as well as in any case their processing or retention is necessary for the establishment, the exercise and the defense of GEK TERNA's legal rights or the fulfilment of GEK TERNA's obligations.

The exercise of the right to data portability (point f above) does not imply the deletion of data from GEK TERNA's records.

VIII. How can the natural person exercise their rights?

In order to exercise her/his rights, the natural persons may address GEK TERNA:

- In writing to:
GEK TERNA S.A. 85 Mesogeion Av., 11526 Athens
c/o: Data Protection Officer (DPO)
- Through email to GEK TERNA's Data Protection Officer to: dpo@gekterna.com

GEK TERNA shall use its best endeavors to address the natural person's request within thirty (30) days of its receipt. The abovementioned period may be prolonged for sixty (60) more days, if deemed necessary according to the discretion of GEK TERNA, taking into account the complexity of the issue and the number of the pending requests. GEK TERNA shall inform the Shareholder within thirty (30) days of receipt of their request in any case of prolongation of the abovementioned period, stating the reasons of such prolongation.

If GEK TERNA does not take action in relation to a natural persons' request, it shall inform the natural person without delay within thirty (30) days of the receipt of their request at the latest, for the reasons it did not take action and for the possibility of the natural person to submit a complaint and initiate judicial proceedings.

The abovementioned service is provided free of charge. However, in case the requests are obviously unfounded, excessive or repetitive, a reasonable fee may be imposed after the natural person has been informed accordingly, or GEK TERNA may refuse to respond to such requests.

IX. How are the natural persons' rights protected?

GEK TERNA applies an information security management system to ensure the confidentiality and security of the natural persons' data processing and the protection of personal data against accidental or unfair destruction, loss, alteration, unauthorized disclosure or access and any other form of unfair processing.

X. Complaints submission

The natural person has the right to file a complaint with the Personal Data Protection Authority (www.dpa.gr) through its online portal <https://eservices.dpa.gr/> by completing the corresponding electronic form, depending on the type of complaint. The Personal Data Protection Authority is the competent supervisory authority for the protection of the fundamental rights and freedoms of natural persons with regard to their personal data processing, when they assume that their rights are infringed in any way, as well as the right to initiate judicial proceedings.

CONTACT DETAILS

I. Data Controller

GEK TERNA S.A. 85 Mesogeion Av., 11526 Athens

Contact phone number: +30 210 69 68 000

II. Data Protection Officer

Andersen Legal - Pistiolis & Triantafyllos & Associates Law Firm

dpo@gekterna.com