



INFORMATION ON THE PROCESSING OF PERSONAL DATA  
OF THE SHAREHOLDERS AND OTHER PARTICIPANTS  
TO THE REMOTE SHAREHOLDERS EXTRAORDINARY GENERAL MEETING  
OF «PUBLIC POWER CORPORATION S.A.»

Data Protection Notice on the processing of personal data of the shareholders and other participants in the remote Extraordinary General Meeting of the Shareholders to be held on **16/12/2021** of the societe anonyme under the trade name:

"Public Power Corporation S.A." and with distinctive title "PPC S.A.", which has its registered seat in Athens, 30 Chalkokondyli st., Tax Reg. No: 090000045, Tax Office: Commercial Companies Tax Office and General Commercial Registry (GEMI) No.: 786301000

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 pursuant to the current legislation as in force on the protection of personal data, PPC shall hereby and in its capacity as data controller provide the required information on the processing of personal data.

## **I) Definitions**

### **Ia) Data subject**

Any natural person who has the capacity of shareholder of the Company, the legal proxy holders and representatives of the shareholders, as well as of the pledged creditors of the shares, anyone who has voting right over the shares and in general derives or/and exercises rights over the shares of the Company, their representatives, those who exercise the voting right by representing legal entities, as well as those who participate in any capacity in the General Meetings of Shareholders of the Company (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").

### **Ib) Data processing**

Any operation or set of operations which is performed upon personal data or 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. The Company, as the issuer of the shares,



legally processes the personal data of the Shareholders, namely the aforementioned natural persons under the aforementioned capacities, always for legitimate and fair purposes, following the principles of the fair and transparent processing, applying the appropriate technical and organizational measures, in compliance with the requirements of the GDPR, as well as the current legal framework, 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, the Company, in compliance with the principle of transparency, is currently informing the Shareholders about the terms of processing of their personal data.

### **Ic) Types of personal data subject to processing**

The personal data of the Shareholders which is collected and processed by the Company 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.

The main categories of personal data concerning the Shareholders and which the Company processes for legitimate purposes of processing include without limitation 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, fixed and mobile telephone number.

(c) Number and type 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 and communication data with Shareholders.

(f) Data relating to the capacity in which the Shareholder participates in the General Meeting of the Company and the relevant supporting documentation, details of the shares and of any rights they hold over such shares, information regarding any trading activity of shares.

(g) Data relating to the participation and the exercise of the voting right of the Shareholder in the General Meeting of the Company, information regarding any requests addressed to



the Company, signature of the Shareholders and in general any information in the context of implementing the current rules on financial instruments markets.

#### **Id) Procedure for personal data collection**

The above personal data is collected either directly by the Shareholders for the performance of tasks relating to them—who shall ensure the update of their personal information, so that the Shareholder Register is always up to date and accurate— or by third persons authorized by the Shareholders, or by the société anonyme under the name "Hellenic Central Securities Depository S.A.", 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 the Company's shareholder structure, any transactions on the shares and are provided to the Company through electronic records, according to the current provisions of the legislation in force and the Regulation of the Dematerialized Securities System (DSS).

#### **II) Purposes of data processing**

The Company collects the personal data of the Shareholders, pursuant to the above and in general processes them, for the fulfilment of legitimate purposes of processing and always according to valid legal basis which establishes the lawfulness of the processing.

Specifically, the Company processes the personal data of the Shareholders in order to:

- (a) Identify the Shareholder.
- (b) Communicate with Shareholder.
- (c) Verify the possibility and legality of exercising Shareholders' rights, pursuant to the relative legislation, as well as facilitate the Shareholders to exercise their rights by virtue of the law (including 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 a shareholders' list, keeping minutes of the General Meeting, participation in corporate actions, dividend distribution).
- (d) Perform corporate actions (e.g. dividend distribution, share capital increase e.t.c.), disclose transactions of liable persons to the Athens Stock Exchange, monitor transactions on the Company's shares.
- (e) Perform the Company's contractual obligations towards the Shareholders (i.e. dividend distribution) and in general fulfil the Company's obligations towards the Shareholders.
- (f) Comply with the legal obligations of the Company.
- (g) Fulfil and support legal rights, protect and service the legitimate interests of the Company (such as in case of legal claims of the Company), except where such interests are



overridden by the interests or fundamental rights and freedoms of the data subjects which require protection of personal data.

(h) Fulfil the obligations arising from provisions of tax legislation and other compulsory provisions.

(i) Manage and maintain the Shareholder Register, in accordance with the applicable legal provisions.

(j) Perform over the counter transfers of the shares.

(k) Publish acts and information of the Company in the General Commercial Registry (G.E.M.I.), the Athens Stock Exchange or on the website of the Company, as required by law.

(l) Respond to requests of the Shareholders, carry out requests of the Shareholders in connection with the services provided by the Company (e.g. issuance of certificates), provide answers and clarifications to specific inquiries or requests addressed to the Company by the Shareholders.

(m) Keep a historical archive of the Company's Shareholders.

### III) Data Recipients

Access to the personal data of Shareholders shall be provided only to the Company'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.

The Company shall not transmit, communicate or disclose the personal data of the Shareholders to any person other than:

(a) Natural persons and legal entities to which the Company assigns the execution of certain tasks on its behalf, such as, inter alia, to providers of technical and support services, 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, web hosting services providers including cloud services, in general to providers of services, to lawyers, law firms, accountants, chartered auditors-accountants or audit firms, to external advisors and collaborators of the Company.

(b) The société anonyme under the name "Hellenic Central Securities Depository S.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 (by way of indication Bank of Greece, European Central Bank, Hellenic Capital Market Commission, Athens Stock Exchange, Hellenic Central Security Depository, Anti-Money Laundering Authority, Deposits and Loans Fund, General Commercial Registry).



(d) Other Shareholders of the Company, as appropriate, in accordance with the law.

The Company has lawfully ensured that any data processors, acting on its behalf, according to the abovementioned, shall meet all requirements and provide sufficient guarantees with regard to the implementation of appropriate technical and organizational measures in such manner that the said processing meets the requirements of the GDPR and in general of the applicable legislative and regulatory framework and ensures the protection of the rights of the data subjects. In case that transfer of personal data to third countries (i.e. to countries outside the European Economic Area (EEA) or international organizations is required, such transfer and in general processing shall be subject to compliance with the GDPR and in general the legislative 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 GDPR is not undermined and that sufficient safeguards are provided for the protection of personal data.

#### **IV) Data retention time limits**

The personal data will be kept by the Company for the period of time as set out by law and in general as required by law and pursuant to the legal and/or regulatory framework in force or as required for the purposes of legitimate interests of the Company, for the exercise of claims and for the defence of the Company in case of litigation, for the pursuit of claims of the Company as well as for the performance of its contractual obligations, and in general in accordance with the current applicable legal basis and the purpose of their processing.

#### **V) Personal data protection and security measures**

The Company has incorporated into its systems, policies and internal procedures all the technical and organizational measures aimed at ensuring the lawfulness, objectivity of processing, transparency, limitation of purpose, minimization, accuracy, storage period limitation, integrity and confidentiality and is in full compliance with all principles relating to the processing of personal data of the Shareholders, in accordance with the provisions of the GDPR and the applicable legal framework. At the same time, the Company 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, prohibited dissemination or access and in general any other form of unfair processing.

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

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



(a) Right of access to the personal data concerning the Shareholder, and specifically right to know which personal data concerning him/her, are kept and processed by the Company, their source as well as the purposes of the processing, the categories of the personal data, the recipients or categories of recipients (article 15 of GDPR).

(b) Right to rectification of inaccurate personal data, as well as to supplementation of incomplete personal data, so as to be complete and accurate, by submitting any necessary document which shows the need for supplementation or rectification (article 16 of GDPR).

(c) Right to erasure (right to be forgotten) of the personal data, when inter alia, there is no longer valid purpose of processing, subject to the Company's obligations and legal rights to retain them, pursuant to the current applicable laws and regulations (article 17 of GDPR).

(d) Right to restrict processing whether because the accuracy of the personal data is contested, or the processing is unlawful or the purpose of the processing ceased to exist and provided that there are no legal grounds to retain them (article 18 of GDPR).

(e) Right to data portability, by virtue of which the data subject has the right to receive his/her personal data, which he/she has provided to the Company, in a structured, commonly used and machine-readable format or the right to ask the transmission of these data to another controller, provided that the processing is based on consent and is carried out by automated means and without prejudice to any legal rights and obligations of Company to retain the personal data (article 20 of GDPR).

(f) Right to object to the processing of his/her personal data on grounds relating to the particular situation of the Shareholder in case the processing is carried out for the purposes of the legitimate interest pursued by the Company or by any third party, or in carrying out a task in the public interest or during the exercise of official authority (article 21 of GDPR).

Furthermore, the Shareholder, as data subject, has the right not to be subject to a decision of the Company made solely by automated processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her, unless special reasons occur according to the legislation in force (article 22 of GDPR).

(g) In case that the data processing is based on the prior explicit consent of the Shareholder, the Shareholder 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 before withdrawal.

(h) The right to lodge a complaint with the competent supervisory authority, by which the Shareholder shall have the right to lodge a complaint with the Hellenic 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, in relation to the processing of his/her personal data, if he/she considers that his/her rights are infringed in any way





whatsoever and that the processing infringes the current applicable legislation, as well as the right to take legal action. Furthermore, it shall be noted that the Company shall have, in any case, the right to refuse to comply with a Shareholder's request if, by way of indication, the personal data processing is necessary for retaining the shareholder capacity and/or his/her voting right, for exercising his/her right as Shareholder of the Company and/or exercising his/her voting right, as well as for establishing, exercising or defending the Company's legal rights, for the compliance of the Company with its legal obligations or for the fulfilment of the Company's obligations towards the Shareholders.

The Company reserves in any case the right to deny the erasure of the Shareholder's personal data if such personal data is essential for the purposes of maintaining the archive of the Company's Shareholders, as well as if the processing or retention of such data is necessary for the establishment, the exercise and the defence of the Company's legal rights or the fulfilment of the Company's obligations. The right to data portability does not entail erasure of this data from the Company's records.

#### VII) Mode of exercise of data subjects' rights

Any request of a Shareholder relating to his/her personal data that is subject to processing by the Company, as well as relating to the exercise of his/her rights shall be addressed in writing to the Company and sent at the following e-mail address [cass@dei.gr](mailto:cass@dei.gr) or submitted to the Shareholder Services Unit at the following address 30, Chalkokondyli st. – GR 10432, Athens.

Failure or undue delay of the Company to respond to the requests of the Shareholders, during the exercise of their shareholder rights, shall give to the Shareholders the right to file a complaint with the Hellenic Data Protection Authority, the competent Supervisory authority for the implementation of the GDPR, as mentioned above.

#### SUPPLEMENTARY AND SPECIFIC INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE SHAREHOLDERS OF THE COMPANY AND OTHER PARTICIPANTS IN REMOTE SHAREHOLDERS GENERAL MEETINGS OF THE COMPANY

The Company, in its capacity as personal data controller, additionally to the above with regard to the processing of the personal data of the Shareholders of the Company, hereby notifies the Shareholders that, for reasons of participation in the remote Extraordinary General Meeting of the Shareholders of the Company, which will be held on **December 16, 2021, day of the week Thursday at 11:00 a.m.** as well as in any adjourned or repeat meeting thereof and specifically in the Repeat Extraordinary General Meeting of **December 29, 2021 day of the week Wednesday at 11:00 a.m.**, which will take place remotely, in real time, via teleconference, as well as for reasons of participation in the future in any other General Meeting of the Company or in any remote Repeat General Meetings of the Company and in general for reasons of participation in any remote General Meeting of the Company (hereinafter: the "General Meeting"), the Shareholders' access codes to the online platform [www.athexgroup.gr/AXIAeShareholdersMeeting](http://www.athexgroup.gr/AXIAeShareholdersMeeting),



through which they will have the possibility to participate and vote remotely in the General Meeting (hereinafter the "Online Platform") will be collected and processed either by the Company or by the societe anonyme under the name "Hellenic Central Securities Depository S.A.", data processor on behalf of the Company, to which the Company has assigned the organization of any remote General Meeting, or by any other data processor on behalf of the Company, to which the Company assigns the organization of any remote General Meeting.

Furthermore, the Company informs the Shareholders that pursuant to article 131 (Voting in the General Meeting) par. 2 of Law 4548/2018, the remote voting shall be open and the exercise of the Shareholder's right to vote, as well as the content of their vote cast, if so requested, may be disclosed to the other Shareholders attending the General Meeting.

In addition, the Company, through this supplementary information, in its capacity as data controller, in accordance with the GDPR, Law 4624/2019 and the other provisions on the protection of personal data, informs natural persons other than the Shareholders, who will participate via teleconference (video conference) in the remote General Meeting, such as Members of the Board of Directors of the Company, executives of the Company, auditors and other third parties, that it processes the following personal data, which is collected directly by the data subjects in question, for the purposes of the legitimate interests pursued by the Company for that processing:

(a) Identification data, such as name, surname, father's name, identity card, passport or another equivalent document.

(b) Data relating to the capacity in which such persons are entitled to participate in the General Meeting.

(c) E-mail address, mobile telephone number, in order to enable natural person's participation in the teleconference.

(d) Data image - sound (video) from the participation of the natural person in the General Meeting. Recipients of this data are the executives responsible for the organization of the General Meeting of the Company, the societe anonyme under the name "Hellenic Central Securities Depository S.A." to which the Company has assigned, as data processor on behalf of the Company, the organization of the remote General Meeting as well as any sub-processors (further processors) of the societe anonyme under the name "Hellenic Central Securities Depository A.E." through its cloud services, which is maintained within the European Economic Area (EEA), as well as any other data processor on behalf of the Company, to which the Company entrusts the organization of any remote General Meeting and any sub-processor (further processor) engaged by the above processors.

The above personal data is kept by the Company for the period required by law and in general in accordance with the applicable legal and/or regulatory framework or for the exercise of claims or the defence of the legitimate interests of the Company and in general in accordance with the current applicable legal basis for the retention of personal data based on the purpose that their processing serves. Regarding the rights of the above data





subjects, pursuant to the GDPR, the exercise of these rights by these subjects, as well as in general all other terms, apart from the above, relating to the processing of personal data of the said data subjects, all the above shall apply.

It is further noted that in the context of the remote General Meetings of the Company, the necessary teleconference shall be carried out by using platforms that support security services, ensuring that the link of the planned teleconference is adequately protected and in general before choosing a teleconference solution there shall be careful consideration of the terms of use and the terms of personal data protection, in full compliance with the GDPR, Law 4624/2019 and in general the currently applicable legislation on personal data protection.