



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 **March 30, 2023** 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 S.A. shall hereby and in its capacity as data controller provide the required information on the processing of personal data.

The recipients of the present information, as it will be analysed below, are the shareholders of PPC S.A., those who in any way have voting rights and/or exercise rights on shares of PPC S.A., the proxy holders, the representatives of the above and/or third persons related to the above, in the context of the Extraordinary General Meeting of the shareholders of PPC S.A. on **March 30, 2023**, which will take place exclusively Remotely in Real Time via Teleconference, as well as at any repeat or adjourned or resumed meeting.

I) Definitions

Ia) Data subject

Any natural person who has the capacity of shareholder of PPC S.A., 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 PPC S.A., 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 PPC S.A. (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"), who are under the capacity of data subjects.



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, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. PPC S.A., as the issuer of the shares, legally processes the personal data of the Shareholders, which is in accordance with the provisions of the GDPR and the relevant national legislation (L. 4624/2019) and with Regulation (EU) 596/2014, namely the aforementioned natural persons under the aforementioned capacities, 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, PPC S.A., in compliance with the principle of transparency and the provisions of articles 13-14 of the GDPR, 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 PPC S.A. in the context of the operation and service of the shareholder relationship are necessary, adequate and relevant to the purposes of the processing 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 PPC S.A. processes 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 data with Shareholders regarding contact details, the content of any existing electronic correspondence, letters, inquiries and answers, especially in the context of exercising their rights.



(f) Data relating to the capacity in which the Shareholder participates in the General Meeting of PPC S.A. 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 PPC S.A., information regarding any requests addressed to PPC S.A., 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." (ATHEXCSD), 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 PPC's shareholder structure, any transactions on the shares and are provided to PPC S.A. 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

PPC S.A. 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, PPC S.A. 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 etc.), disclose transactions of liable persons to the Athens Stock Exchange, monitor transactions on the PPC's shares.

(e) Perform the PPC's contractual obligations towards the Shareholders (e.g. dividend distribution) and in general fulfil the PPC's obligations towards the Shareholders.



- (f) Comply with the legal obligations of PPC S.A..
- (g) Fulfil and support legal rights, protect and service the legitimate interests of PPC S.A. (such as in case of legal claims of PPC S.A.), 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) Maintain and manage the data of PPC 's Shareholders Registry, which is fed of data issued by ATHEXCSD.
- (j) Perform over the counter transfers of the shares.
- (k) Publish acts and information of PPC S.A. in the General Commercial Registry (G.E.M.I.), the Athens Stock Exchange or on the website of PPC S.A., as required by law.
- (l) Respond to requests of the Shareholders, carry out requests of the Shareholders in connection with the services provided by PPC S.A. (e.g. issuance of certificates), provide answers and clarifications to specific inquiries or requests addressed to PPC S.A. by the Shareholders.
- (m) Keep an archive of the PPC's Shareholders.

III) Legal basis for processing

The legal basis for the processing of the aforementioned personal data, in order to fulfil the above purposes, is based on Article 6 (1c) of the GDPR in conjunction with Law 4624/2019, namely in order for PPC S.A. to comply with the regulatory framework on societies anonymes (Law 4548/2018), the DSS Regulation (for listed companies) and the decisions of authorities (public, supervisory, independent, prosecuting, etc.) or courts (regular or arbitration courts), and in general for the compliance of PPC S.A. as a Data Controller in its legal obligations with any regulatory framework underlying its lawful operation (e.g. tax, insurance legislation).

Also, the legal basis for the processing of your above personal data may be based on art. 6 (1a) of the GDPR, provided that such personal data have been collected with your consent.

In addition to the above, the processing of the personal data mentioned herein, may also serve other purposes, such as keeping a record of PPC's S.A. shareholders, exercising and supporting any legal claims, conducting analyses and statistics, as well as promoting PPC's corporate image and activities. In any case, should the need arise for further processing of your personal data, for purposes other than those mentioned above, we will contact you in advance.



IV) Data Recipients

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

PPC S.A. 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 PPC S.A. 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 PPC S.A..

(b) The societe 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, Anti-Money Laundering Authority, Deposits and Loans Fund, General Commercial Registry).

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

PPC S.A. 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 with 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.

V) Data retention time limits

The personal data will be kept by PPC S.A. 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 PPC S.A. or of 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 performance of its contractual obligations, and in general in accordance with the current applicable legal basis and the purpose of their processing.

VI) 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 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, 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, prohibited dissemination or access and in general any other form of unfair processing.

VII) Rights of data subjects

In order to maintain these data in accordance with the provisions of the General Data Protection Regulation 2016/679 and Law 4624/2019, PPC S.A. takes all necessary technical and organizational measures for the secure processing of these data and ensures the appropriate level of data security against risks such as destruction, loss, alteration, undue disclosure/access, unauthorized read-copy, modification or deletion of personal data, so as to ensure the confidentiality, integrity, security, availability and reliability of the processing systems and services on an ongoing basis.

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 PPC S.A., 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 PPC'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 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 PPC S.A. 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 PPC S.A. 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).

(f) 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.

(g) **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), 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.

(h) **Other rights provided by GDPR.**

Furthermore, it shall be noted that PPC S.A. 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 PPC S.A. and/or exercising his/her voting right, as well as for establishing, exercising or defending the PPC's legal rights, for the compliance of PPC S.A. with its legal obligations or for the fulfilment of the PPC's obligations towards the Shareholders.

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 purposes of maintaining the archive of PPC'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 PPC's legal rights or the fulfilment of the PPC's obligations. The right to data portability does not entail erasure of this data from the PPC's records.



VIII) Mode of exercise of data subjects' rights

PPC S.A. meets its obligations in relation to the exercise of data subjects' rights by applying articles 12-23 of the GDPR and articles 31-35 of Law 4624/2019 as well as according to the policies it has adopted.

Any request of a 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 addressed in writing to PPC S.A. and sent at the following e-mail address cass@dei.gr submitted to the Shareholder Services Unit at the following address: 30, Chalkokondyli st. – GR 10432, Athens.

Failure or undue delay of PPC S.A. 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.

PPC S.A., based on the personal data protection policy in effect at any time and in the context of the legislative and regulatory framework in effect at any time, may revise or modify this information, whose updated version will always be available on the website <https://www.dei.gr>.

SUPPLEMENTARY AND SPECIFIC INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE SHAREHOLDERS OF PPC S.A. AND OTHER PARTICIPANTS IN REMOTE SHAREHOLDERS GENERAL MEETINGS OF PPC S.A.

PPC S.A., in its capacity as personal data controller, additionally to the above with regard to the processing of the personal data of the Shareholders of PPC S.A., hereby notifies the Shareholders that, for reasons of participation in the remote **Extraordinary General Meeting** of the Shareholders of PPC S.A., which will be held on **Thursday, March 30, 2023 at 11:00 a.m.** as well as in any adjourned or repeat meeting thereof and specifically in the **Repeat Extraordinary General Meeting of Holy Wednesday of Orthodox Easter, April 12, 2023 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 PPC S.A. or in any remote Repeat General Meetings of PPC S.A. and in general for reasons of participation in any remote General Meeting of PPC S.A. (hereinafter: the "General Meeting"), the Shareholders' access codes to the online platform 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 PPC S.A. or by the societe anonyme under the name "Hellenic Central Securities Depository S.A.", data processor on behalf of PPC S.A., to which PPC S.A. has assigned the organization of any remote General Meeting, or by any other data processor on behalf of PPC S.A., to which PPC S.A. assigns the organization of any remote General Meeting.



Furthermore, PPC S.A. 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, may be disclosed to the other Shareholders attending the General Meeting, according to the provisions in effect and the procedures provided for.

In addition, PPC S.A., 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 PPC S.A., executives of PPC S.A., 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 PPC S.A. 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 PPC S.A., the societe anonyme under the name "Hellenic Central Securities Depository S.A." to which PPC S.A. has assigned, as data processor on behalf of PPC S.A., 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 PPC S.A., to which the PPC S.A. 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 PPC S.A. 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 PPC S.A. 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 PPC S.A., 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.