

PRIVACY NOTICE

The company “**HELLENIC EXCHANGES – ATHENS STOCK EXCHANGE S.A.**” (hereinafter “Company”) respects the importance of protecting personal data and ensuring that their processing is lawful. This notice concerns the processing of your personal data, which is carried out when you use the application “**ATHEX ESG Data Portal**” (hereinafter “Application”) and its aim is it to inform you on the personal data collected, to explain the means and purposes of data processing, to state any third parties with whom the Company shares your personal data and finally to inform you on your data protection rights. Please read this notice in order to be informed in detail about the terms of processing your data:

Data Controller

The Company is, pursuant to General Data Protection Regulation (EE) 2016/679 and national law 4624/2019, the data controller of your personal data, which are collected when you use the Application. The registered seat of the Company is in Athens, at 110 Athinon Ave., postal code 104 42, contact telephone number: +30 210 33 66 800.

Processing purpose & Collection of personal data

The personal data which are collected by the Company are processed solely, for a) the provision of access to the Application, b) the management of your access to the Application, such as the management of security incidents and weaknesses, as well as the management of log files.

Personal data are either collected directly from you, or from your employer, with whom the Company has signed a services agreement, or created when you use the Application (e.g. logs). The Company may process personal data, such as:

1. Basic data of the Application user (e.g. name, surname).
2. Contact data (email address, phone number).
3. Professional data (job position, company, company logo).
4. Information that are included in requests submitted through e-HelpDesk.
5. Digital data (username, password).
6. Computer data (e.g IP address, log files, etc.).

Legal basis for the processing of personal data

The legal basis for the processing of personal data, which is carried out for the provision of access to the Application, differs depending on the relationship of the Company with you. More precisely:

a) Contract (Article 6 par. 1b GDPR)

If the processing is carried out within the context of a collaboration – services agreement signed with the Company, it is lawful, pursuant to Article 6 GDPR, as it is necessary for the performance of the agreement concluded between us.

b) Legitimate Interest (article 6 par. 1f GDPR)

If you are an executive of a legal entity with which the Company has entered into a collaboration agreement, on the basis of which you become a user of the Application, the Company processes your data in order to ensure the successful, timely and effective performance of the agreement between the Company and your employer. This processing is carried out on the basis of the Company's legitimate interest to perform the agreement concluded with your employer.

Furthermore, with regard to the processing carried out in pursuit of purpose b', the legal basis is the legitimate interest of the Company, which consists in particular in ensuring the security of the Company's network, systems and information. This legal basis applies both in cases where you are a user of the Application under a collaboration - services agreement you have concluded with the Company, as well as in cases where you are an executive of a legal entity with which the Company has signed a collaboration agreement, on the basis of which you are a user of the Application.

Recipients of personal data

The Company shall ensure that your personal data are processed solely by its necessary personnel, which has been adequately informed regarding the secure processing of your personal data. Additionally, for the fulfilment of the aforementioned purposes, recipients of your personal data also include natural and legal persons, to which the Company assigns the performance of specific tasks on its behalf, such as technical support companies or/and system maintenance companies, software providers and security services providers. These companies, acting as processors, are contractually bound to ensure confidentiality of personal data, as well as to follow Company's instructions regarding the processing of personal data and take all appropriate measures for their protection.

Furthermore, your personal data may also be disclosed to supervisory, administrative, judicial, public or/and other authorities and bodies, provided that their disclosure is required by the applicable legislation or provided therein, as well as to lawyers/ law firms, auditors or audit companies.

Transfers of data to countries outside the European Economic Area (EEA) or international organisations

Your personal data are not transferred to third countries (outside the European Economic Area).

Data retention period

Your personal data are only retained for the reasonable period of time, which is necessary due to the nature of the processing and only for as long as this is required for the fulfillment of each processing purpose. At the end of this period, your personal data will be deleted, unless otherwise required under the applicable legal and regulatory framework or for the establishment, exercise or defense of legal claims.

Your rights

In accordance with the provisions of Regulation (EU) 2016/679 (GDPR), as a data subject, you have the following rights, which may be exercised as appropriate:

- Right to access your personal data.

- Right to correct and/or update your data.
- Right to deletion / right to be forgotten.
- Right to restrict processing.
- Right to data portability.
- Right to object to the processing of your personal data.

Exercise of rights

If you wish to receive further information about the processing of your personal data or exercise any of your rights, you can contact the Company either in writing at: Athens Exchange S.A., 110 Athinon Ave., 104 42 Athens, for the attention of: Data Protection Officer (DPO), or by e-mail addressed to the Data Protection Officer (DPO) of the Company at: dataprotectionofficer@athexgroup.gr.

The Company shall reply to your request within one (1) month of its receipt and at no cost to you. This time limit may be extended for a period of two (2) more months, due to the complexity or number of requests. In this case, you will be notified regarding the extension and the reasons for it at the earliest and no later than one month after receiving the request.

Security of personal data

The Company implements an information security management system, in order to ensure secrecy, security of data processing and protection of personal data from any accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, as well as from all inappropriate forms of processing.

The Company has implemented all appropriate organizational and technical measures, pursuant to the applicable legal framework, in order to safeguard that processing of data is legitimate, appropriate and secured against any unauthorized or illegal access. In this respect, the authorised personnel of the Company has received the appropriate training and guidance.

The measures taken by the Company are reviewed and amended regularly or when deemed necessary based on new needs and technological developments.

Right to lodge a complaint

If you believe that: a) any request submitted by you has not been adequately and legally satisfied, or b) your right to personal data protection is being breached by any processing that is carried out by the Company, you have the right to lodge a complaint, through the dedicated online portal of the Hellenic Data Protection Authority (postal address: 1-3 Kifissias Ave., 115 23, Athens, <https://www.dpa.gr/>, tel. 210 6475600, e-mail: contact@dpa.gr). You may find detailed guidelines on how to lodge a complaint on the Hellenic Data Protection Authority's website.