

HELLENIC REPUBLIC CAPITAL MARKET COMMISSION

INFORMATION PROVIDED TO DATA SUBJECTS

(Articles 13 and 14 of the General Data Protection Regulation)

Data included in the notifications of delayed disclosure of inside information and any accompanying documents submitted by the supervised issuers under the provisions of Article 17 of Regulation (EU) 596/2014 (MAR).

This notice concerns natural persons whose data is included in the notifications of delayed disclosure of inside information and any accompanying documents submitted by the supervised issuers under the provisions of Article 17 of Regulation (EU) 596/2014 (MAR).

Data Controller

HELLENIC CAPITAL MARKET COMMISSION - LEGAL ENTITY, with registered office in Athens (Kolokotroni 1, Athens 105 62), tel. 210-33.77.100.

The Hellenic Capital Market Commission was established as a legal entity (Greek law 1969/1991) and was organized by Greek law 2324/1995 with its registered office at Kolokotroni 1 & Stadiou, Athens 105 62, aiming to ensure the protection of investors and the orderly operation of the Greek capital market, operates exclusively in the public interest, and in general processes personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority vested in it as a data controller.

The Hellenic Capital Market Commission, as controller, collects, maintains and processes personal data for specified, explicit and legitimate purposes and such data shall not be further processed in a manner incompatible with those purposes.

The Hellenic Capital Market Commission does not process special categories of personal data ("sensitive data") except where required by the applicable legislation in the exercise of its supervisory role.

This data is collected through the notifications of delayed disclosure of inside information submitted to the Hellenic Capital Market Commission under the provisions of Article 17 of Regulation (EU) 596/2014 (MAR) by supervised issuers that employ or cooperate with the data subjects.

Purpose of processing and categories of personal data

The personal data collected, maintained and processed by the Hellenic Capital Market Commission as data controller is used within the framework of its tasks for the supervision of compliance with the relevant provisions of Regulation (EU) 596/2014 and Greek law 4443/2016 (Government Gazette A' 232/9.12.2016) to enhance market integrity and investor confidence in financial markets.

The personal data are collected and processed lawfully for the achievement of the abovementioned specified, explicit and legitimate purpose.

The personal data subject to the above processing is data relating to, but not limited to, nominative individual information and professional status details.

Legal basis

The legal basis for the processing of the above personal data is the provision of Article 6 par. 1(c) of the GDPR, as the collection and processing of such data constitutes a legal obligation of the controller, as mentioned above.

Recipients

The Hellenic Capital Market Commission collects, maintains and processes personal data submitted to it for supervisory purposes and does not further transmit it to third parties.

Responsible authorized officers

The Director of Listed Companies and the Head of Continuous Information Department of the Listed Companies Directorate of the Hellenic Capital Market Commission are responsible for personal data issues included in the notifications of significant changes in voting rights.

Data Protection Officer

The HCMC has appointed a Data Protection Officer (DPO).

Contact details of the Data Protection Officer: <u>dpoepke@cmc.gov.gr</u> or by post to the address: KOLOKOTRONI 1 & STADIOU, ATHENS 10562 (Attention: Data Protection Officer)

Data retention period

The Hellenic Capital Market Commission keeps the personal data in its records for at least 25 years with the possibility of further retention for archiving purposes in order to perform a task carried out in the public interest and/or in the exercise of an official authority entrusted to the Hellenic Capital Market Commission, as a controller.

Rights of data subjects

According to Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation), any data subject has the right to submit a request to the controller for access, rectification, opposition, erasure, restriction of processing of data concerning it.

The abovementioned rights shall be exercised by submitting a written request by the interested party addressed to the Hellenic Capital Market Commission and the competent Directorate (as above) of the Hellenic Capital Market Commission (Directorate of Listed Companies of the Hellenic Capital Market Commission, Department of Continuous Information).

Any interested party has the right to lodge a complaint with the competent supervisory authority, the Hellenic Data Protection Authority.

Hellenic Data Protection Authority (DPA) details:

Offices: Kifissias 1-3, Athens 115 23 tel: +30-210 64.75.600 Fax: +30-210 64.75.628 E-mail: <u>contact@dpa.gr</u>

The HCMC is in constant alignment and compliance with the terms of the GDPR and is constantly making every effort to comply with it.

Reviews

Prior to any potential changes to the processing of personal data through the Website, we will amend this Notice accordingly and publish it, so that you are informed and exercise effectively your rights.