



**Information to the shareholders of the company “ELLAKTOR SOCIÉTÉ ANONYME” on personal data protection within the framework of the General Data Protection Regulation 2016/679 (GDPR), of Law 4624/2019 and of the legislation in force, during the General Meetings.**

With this information, the company "ELLAKTOR SOCIÉTÉ ANONYME" with the trading name "ELLAKTOR S.A." (hereinafter "ELLAKTOR"), with registered office on 25, Ermou street, Kifisia (General Commercial Registry (GEMI) No 251501000, TIN 094004914, Athens Tax Office for Sociétés Anonymes), wishes to provide you with information, in its capacity as Data Controller, in accordance with Regulation (EU) 2016/679 (hereinafter referred to as the “Regulation”), with Law 4624/2019 and with the other provisions of the applicable relevant legislation, with regard to the way in which your personal data are processed as well as information on your rights as Data Subject arising under the above legislation.

Those receiving this information, as will be analyzed below, are the shareholders of ELLAKTOR, persons who have voting rights in any way or/and persons who exercise rights in respect of ELLAKTOR shares, agents, representatives of the above or/and third persons in general who are associated with the above persons, in the context of conducting a General Meeting of the shareholders of ELLAKTOR, which will take place Remotely in Real Time through Teleconference or with physical presence, as well as at any repeat meeting or meeting after an adjournment or suspension.

**1. What data is processed by ELLAKTOR and on which legal basis?**

ELLAKTOR processes your personal data in accordance with the GDPR, Law 4624/2019, the Operation Regulation of the Dematerialised Securities System (DSS Regulation) and in accordance with any other relevant law, for the lawful performance of the General Meetings, and for the purposes of the above applicable regulatory framework.

In particular, the personal data that ELLAKTOR collects exclusively and solely for the purpose of serving the shareholder relationship are the following:

- i) Subject's identification data: name, father's name, mother's name, identity card or passport, T.I.N, nationality, profession, etc.
- ii) With regard to representatives of legal persons, agents who have been appointed for attending the General Meeting and for the exercise of the right to vote and third parties in general who are related to the above, we collect data in relation to the representation and proxy documents, in general, which concern the legitimization of the above persons to participate in the General Meeting.
- iii) Number and category of shares/voting rights/rights on shares, DSS share number, securities account number.

- iv) Contact data: postal and electronic address or/and email address, landline or/and mobile phone number, fax number etc.
- v) Data which emerge from the shareholding relationship, indicatively, percentage and type of participation, trading activity on shares.
- vi) Data which may emerge in the context of any remote participation in the general meeting by electronic means (codes, email address, profile, etc.).

The legal basis for the processing of your above personal data, in order to fulfill the foregoing objectives, is Art. 6 (1c) of GDPR in combination with Law 4624/2019, i.e. in compliance with ELLAKTOR's regulatory framework on sociétés anonymes (Law 4548/2018), the DSS Regulation (for listed companies) as well as in compliance with decisions of authorities (public, supervisory, independent, prosecution, etc.) or courts (ordinary or arbitral), and, in general, for compliance of the company as Data Controller with its legal obligations towards any regulatory framework governing its lawful functioning (i.e. tax, insurance legislation).

In addition to the above, the processing of the personal data referred to in this document may also serve purposes such as keeping a historical record of the shareholders of ELLAKTOR, exercising and supporting any legal claims, carrying out analysis and statistics, as well as the projection of the corporate image and activities of ELLAKTOR, i.e. for serving the legal interests of the company.

If a situation may occur where it will be necessary to further process your personal data for purposes other than those mentioned above, we will communicate with you in advance.

2. Is ELLAKTOR the only one who has access to personal data or do third natural or legal persons also have access thereto?

In the context of providing services to the shareholders and also within ELLAKTOR, access to such personal data shall be granted only to the competent personnel for which this access is strictly necessary for the performance of its duties.

Should ELLAKTOR cooperate with third companies (service providers, agents, etc.) for the purpose of holding a General Meeting, those companies shall have access to your personal data, exclusively as assistants - processors and shall be contractually committed as regards the protection and legal processing of the processed data, in accordance with the provisions of the legislation (Article 28 GDPR), whereas in this case, ELLAKTOR, as the Controller, is by law exclusively responsible to shareholders for the processing of their personal data.

In addition, in the context of compliance by ELLAKTOR with the applicable legal framework, your personal data may also be transmitted to the competent Authorities and Services (indicatively General Commercial Register, Capital Market Commission, Athens Stock Exchange) and in such case the aforementioned recipients of personal data shall process the shareholders' data on their own responsibility in accordance with their statutory obligations.

3. How long does ELLAKTOR keep the collected personal data?

Personal data which is processed by ELLAKTOR shall be kept mandatorily throughout the period which is necessary in order to fulfill the purpose of the processing. At the end of this period, the

data shall be deleted unless otherwise provided for in the applicable legislative and regulatory framework or to the extent necessary for defending the Company's rights before the court or other competent Authority.

ELLAKTOR does not process the above data for other purposes and it only processes personal data which is necessary for the purpose of the relevant processing, which shall always take place lawfully and in accordance with the spirit and terms of the GDPR, of Law 4624/2019 and of the applicable legislation.

#### 4. What rights do you have to protect your data as data subjects?

For the purpose of maintaining your data in accordance with the provisions of General Data Protection Regulation 2016/679 and of Law 4624/2019, ELLAKTOR shall take all necessary technical and organizational measures for the secure processing of such data and for ensuring the appropriate level of data security against risks, e.g. destruction, loss, alteration, disclosure/access without cause, unauthorized reading-copying, modification or deletion of personal data, in order to ensure the confidentiality, integrity, security, availability and reliability of processing systems and services on an ongoing basis.

As data subject, you have the right to access, under certain conditions, the recorded data that concern you, as well as the right to receive the above data which relates to you in a structured, commonly-used and machine-readable format (right to portability), the right to rectification if your data is inaccurate, the right to delete personal data that concern you, unless the maintenance thereof is required by law, the right to restrict processing, the right to object at any time to the processing of personal data that concern you, including the processing which is aimed at building profiles, and in general all the rights which are provided for in Chapter III of the GDPR.

In order to exercise your above rights as well as for any other information or questions on the processing of your personal data, you can send an email to [dpo@ellaktor.com](mailto:dpo@ellaktor.com).

If you exercise any of your above rights, ELLAKTOR will take all possible steps to satisfy your request within thirty (30) days of receipt thereof and you will be informed of its progress. It is further noted that this deadline may be extended by two (2) more months, taking into account the complexity of your request, as well as the amount of requests in general. These rights are exercised at no cost to you, unless they are repeated frequently and, in view of their volume, they have an administrative costs for us, in which case you will have to bear the relevant costs.

Furthermore, ELLAKTOR will inform you of any breach of your personal data, in case that this breach may pose a high risk to your rights and freedoms and provided that this breach does not fall under one of the exceptions which are expressly provided for by law.

You also have the right to appeal to the Hellenic Data Protection Authority if you consider that your rights with regard to the processing of your personal data are affected.