

WEBSITE PRIVACY POLICY

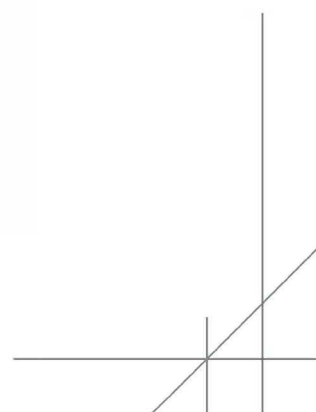
GROUP COMPLIANCE DIVISION

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1. INTRODUCTION

The website <https://www.ellaktor.com/> (hereinafter the "Website") is managed by the company under the name "ELLAKTOR S.A." (hereinafter the "Company"), which acts as the Data Controller of the personal data collected from visitors/users during their visit to the above-mentioned website, as such data are collected and stored through the Website.

ELLAKTOR treats the protection of privacy and personal data with particular seriousness and has taken all necessary measures to safeguard the security and confidentiality of information relating to the visitors/users of the Website.

Visitors/users are kindly requested to carefully read this Website Privacy Policy in order to be informed about the information collected during the visit and use of the online services, the information posted on the Website, as well as the processing thereof by the Data Controller and their rights.

2. DEFINITIONS

"Group" means the group of holdings of the company "ELLAKTOR S.A.", namely the Company and the companies controlled by it ("subsidiaries").

"Policy" means the Website Privacy Policy.

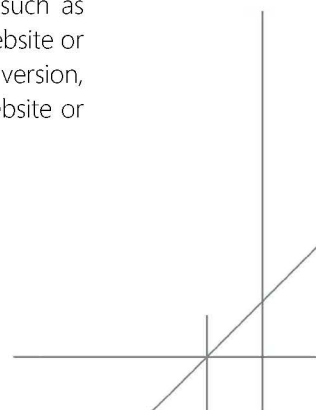
3. SCOPE OF APPLICATION

This Policy applies to any processing of personal data of visitors/users of the Website <https://www.ellaktor.com/>.

Each subsidiary and joint venture controlled by the Company that uses the above Website must adopt this Policy and shall be fully bound by its provisions.

4. DATA COLLECTION AND USE

Our Website may collect personal data when a visitor/user registers for any of the available applications (e.g. newsletter) or when using the Website environment to communicate with ELLAKTOR, such as information related to their computer and visits to the Website, as well as their activity on this website or connected applications. This includes their IP address, geographical location, browser type and version, operating system, referral source, visit duration, pages viewed, and navigation paths on the website or connected applications (see more in the Cookies Policy).



5. PURPOSES OF PROCESSING

The collected data are used for the following purposes:

A. IT Systems Support / Improvement of Provided Services

We use your personal data to detect server issues and ensure the proper operation of our Website. The Company uses personal data collected through the Website in order to offer new services or improve existing ones.

Legal basis: The legitimate interest of the Company to ensure the uninterrupted operation of its Website and to improve its services.

B. Compliance with Legal Obligations

When we receive court orders or requests from public authorities, we process your personal data in order to comply with such requests.

Legal basis: Compliance with legal obligations.

C. Legal Protection of the Company

Ensuring compliance with the Website's terms of use and protecting our legal rights.

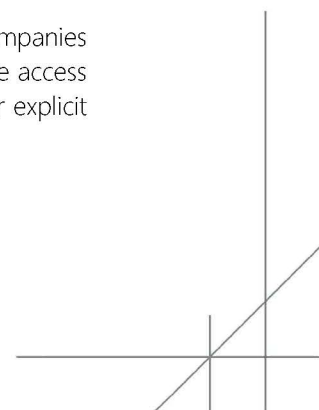
Legal basis: The legitimate interests of the Company.

6. MINORS

When collecting data directly from visitors/users, we take appropriate measures to determine, to the extent technically feasible, whether any collected personal data relate to minors. In any case, if we become aware that we have collected personal data from a minor under the age of 16 without verifiable parental consent in accordance with Article 8 of the EU General Data Protection Regulation (GDPR) 679/2016, we will delete such information from our database as soon as possible.

7. DATA RECIPIENTS

Where necessary for the fulfillment of the above processing purposes, we may use third-party companies providing Website support and management services to ELLAKTOR. Such third parties will have access only to strictly necessary information and solely for performing their tasks on our behalf, under explicit contractual obligations to ensure confidentiality and data security.



We may disclose visitor/user information in response to court subpoenas, search warrants, legal proceedings, requests from competent supervisory authorities, or to establish, exercise, or defend our legal rights.

We may also share aggregated or non-identifiable information with third parties for the development of our Website content and services.

8. DATA RETENTION PERIOD

Data are retained for as long as necessary to fulfill the processing purpose and in any case for a maximum period of five (5) years, unless a different retention period is required by applicable law.

Data relating to inquiries and communications are retained for as long as necessary to process such requests and in any case no longer than one (1) year.

Data relating to newsletter subscriptions are retained until consent is withdrawn.

9. DATA SECURITY

The Company and/or the Group collect, retain, and process personal data in a manner that ensures their protection. The Company takes all appropriate technical and organizational measures to safeguard data security, confidentiality, and protection against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, access, or any other form of unlawful processing.

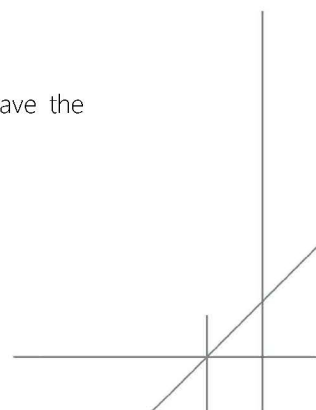
To achieve this, we implement all modern technical and organizational measures appropriate to the purposes of the processing, and we regularly review and assess their effectiveness and adequacy.

Although every effort is made to protect personal data, the Company cannot guarantee the security of data transmitted to its Website, as information transmission over the internet can never be entirely secure.

Our Website may contain links to other websites. We are not responsible for the privacy practices, content, or security of such third-party websites and advise visitors/users to review their respective privacy policies.

10. YOUR RIGHTS AND CHOICES

In accordance with applicable legislation and subject to relevant limitations, visitors/users have the following rights regarding their personal data:



- Right to information and access: You have the right to be informed about and to access the personal data concerning you.
- Right to rectification: You have the right to request the correction of inaccurate personal data relating to you that are processed under this Policy, or the completion of any incomplete personal data.
- Right to erasure: You have the right to request the erasure of your personal data, insofar as this is provided for under applicable legislation.
- Right to restriction of processing: You have the right to request the restriction of the processing of your personal data, insofar as this is provided for under the applicable legislation.
- Right to data portability: You have the right to receive the personal data concerning you in a structured format and to request their transfer to another data controller, insofar as this is provided for by law for the specific processing carried out.
- Right to object: You have the right to object at any time to the processing of your personal data, within the limits set by the applicable legislation.
- Right not to be subject to automated individual decision-making, including profiling: You have the right to object where a decision concerning you is based solely on automated processing, including profiling, and where such decision produces legal effects concerning you or similarly significantly affects you.

The Company has appointed a Data Protection Officer (DPO). In order to withdraw your prior consent or to exercise any of the above rights, as well as for any information or clarification regarding these rights and the conditions for exercising them, you may contact us by email at dpo@ellaktor.com.

Furthermore, in accordance with applicable legislation, if you consider that, after exercising your rights, data protection legislation has been violated, and provided that the relevant conditions are met, you have the right to contact the competent Data Protection Authority (for Greece, the Hellenic Data Protection Authority - HDPA, 1 Kifisias Ave., 115 23 Athens, tel. +30 210 6475600) and to lodge a relevant complaint.

11. REVIEW

This Website Privacy Policy is approved by the Chief Executive Officer and is reviewed whenever necessary. The responsibility for the preparation and proposal of revisions to the Policy lies with the Head of Compliance.

Under the responsibility of the Group Compliance Division, the Website Privacy Policy is posted up-to-date on the Group's website www.ellaktor.com.

Visitors/users of our Website should read this Website Privacy Policy regularly, in conjunction with the Cookies Policy, in order to stay informed of any revisions that may have been made. The Company undertakes to provide the necessary updates to visitors and users by any appropriate means, in compliance with the requirements set forth by the EU General Data Protection Regulation (GDPR) 679/2016.

