

**DIMAND SOCIETE ANONYME DEVELOPMENT AND EXLPOITATION OF REAL ESTATE  
AND CONTRUCTIONS, SERVICES AND HOLDING**

**DATA PROTECTION NOTICE ON THE PROCESSING OF PERSONAL DATA OF THE  
SHAREHOLDERS AND OTHER PARTICIPANTS TO THE ANNUAL REMOTE GENERAL  
MEETING OF SHAREHOLDERS OF 7 SEPTEMBER 2022**

The société anonyme under the trade name “DIMAND SOCIETE ANONYME DEVELOPMENT AND EXLPOITATION OF REAL ESTATE AND CONTRUCTIONS, SERVICES AND HOLDINGS” and the distinctive title “DIMAND S.A.”, which has its registered seat in Athens (115 Neratziotissa Str.), TIN No. 999631074, Tax Office: Athens Tax Office for Commercial Companies (FAE Athinon), General Commercial Registry (GEMI) No.: 004854501000 (hereinafter referred to as the “Company”), in its capacity as the data controller, in the context and in compliance with the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as “GDPR”), the Law 4624/2019 and according to currently applicable European and national legislation in force with regard to the protection of personal data (hereinafter jointly referred to as “Data Protection Legislation”), shall hereby provide the necessary information on the processing of personal data (i) to the natural persons who have the capacity of shareholder of the Company, to their representatives or proxies, to the legal representatives and representatives of legal entities who have the capacity of shareholder of the Company, to those who have voting rights, and in general derive and/or exercise rights over the shares of the Company and their representatives (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”) and (ii) to natural persons other than the Shareholders, who will have the right to participate to the remote General Meeting of Shareholders, such as the Members of the Board of Directors of the Company, executives of the Company, auditors and other third parties (hereinafter, for the purposes of the present, they will be jointly referred to as “Other Participants”). The persons under points (i) and (ii) will, for the purposes of the present, be hereinafter jointly referred to as “Data Subjects”.

**I. Definitions**

“Personal data” or “data” means any information relating to an identified or identifiable natural person (“data subject”), an identifiable natural person is one who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Processing” means any operation or set of operations which is performed on personal data or on 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.

In compliance with Data Protection Legislation and in particular in accordance with the principle of transparency, the Company hereby informs the aforementioned persons – Data Subjects regarding the processing of their personal data.

## II. Which of your personal data the Company collects and processes?

The Company, in the context of its statutory organization and operation, collects and processes the personal data of its Shareholders that are absolutely necessary for the compliance of the Company with its obligations deriving from the law and its Articles of Association. Furthermore, the Company collects and processes information about its Shareholders in the context of operation and service of the shareholder capacity and in order to carry out the tasks related to the shareholder capacity as well as for the purposes of holding the General Meeting of Shareholders and serving its legitimate interests. In particular:

(a) The categories of personal data of **Shareholders** that are being processed are the following:

- Data and identity documents, such as name and surname, details of ID/passport and tax identification number (AFM).
- Address data (residence address, work address).
- Contact data (mobile telephone number, fixed residence telephone number).
- Number and type of shares.
- Investor Record Code Number in the Dematerialized Securities System (DSS), Securities Account with the Dematerialized Securities System (DSS), Number of Shareholder's Registry.
- Correspondence data with the Shareholders.
- Data relating to the capacity under which the Shareholder participates to the General Meeting of Shareholders of the Company and the relevant supporting documentation, details of the shares and of any rights they hold on such shares, information regarding any trading activity of shares.
- Data relating to the participation and the exercise of the voting right of the Shareholder in the General Meeting of Shareholders of the Company, information regarding any requests addressed periodically to the Company, signature of the Shareholders and in general any other information in the context of implementing the current provisions on financial instruments markets.
- Data image and/or sound (audiovisual recording) in case that a Shareholder takes the floor during the General Meeting of Shareholders.

The personal data of Shareholders are collected either directly from the Shareholders for the performance of tasks concerning them, or from third persons authorized by the Shareholders, or from the société anonyme under the name "Hellenic Central Securities Depository S.A.", which, at its capacity as operator of the Dematerialized Securities System (DSS), keeps the details of identification and other information for the Shareholders.

The Company informs the Shareholders that, for reasons of their participation to the remote Annual General Meeting of Shareholders of the Company, or any repeat meeting, the codes of access of the Shareholders in the online platform <https://axia.athexgroup.gr>, through which they will have the possibility to participate and vote remotely in the General Meeting of Shareholders, will be collected and processed by the data processor

“Hellenic Central Securities Depository S.A.”, to which the Company has assigned the organization of any remote General Meeting of Shareholders. Moreover, the Company informs the Shareholders that, according to article 131 (way of voting in the General Meeting) para. 2 of Law 4548/2018, the remote voting is open and the exercise of the voting right by the Shareholder and the content of his/her vote, if requested, may be communicated to the other participants in the General Meeting, Shareholders.

(b) The categories of personal data of **Other Participants** that are being processed are the following:

The personal data of Other Participants are collected either directly from Other Participants, or from third parties authorized by them in the context and for the purposes of their participation in the remote General Meeting of Shareholders.

- Data and identity documents, such as name and surname, details of ID/passport.
- Address data (residence address).
- Data relating to the capacity under which such persons are entitled to participate to the General Meeting of Shareholders.
- E-mail address and/or mobile telephone number, in order for the natural person to participate remotely.
- Data image and/or sound (video) from the participation of the natural person to the General Meeting of Shareholders.

### **III. For which purposes and on which legal grounds does the Company process your personal data?**

The Company collects and processes the personal data of Shareholders and of Other Participants for purposes of compliance of the Company with its statutory, regulatory and legal obligations, holding the General Meeting of Shareholders, the fulfillment of its corporate purpose and the overall service of the Company's activity. In particular:

(a) The purposes for which the Company processes the personal data of **Shareholders** are the following:

- Their identification for purposes concerning the shareholder capacity and participation to the General Meeting of Shareholders.
- The communication with them for purposes concerning the shareholder capacity and participation to the General Meeting of Shareholders.
- To manage and maintain the Shareholder Register and an archive of Shareholders.
- The fulfillment of obligations of the Company towards the Shareholders and the response to their requests.
- The conduct and implementation of corporate actions, the disclosure of transactions of liable individuals to the Athens Stock Exchange, the monitoring of transaction on the Company's shares.

- The control of the possibility and lawfulness of exercising shareholders' rights, according to the applicable legislation.
- The compliance of the Company with the obligations provided by the current applicable legislation (corporate legislation, capital markets legislation, tax legislation etc.).
- The fulfillment and support of legal rights of the Company.
- The protection and service of the legitimate interests of the Company except where such interests are overridden by the interests or fundamental rights and freedoms of the data subjects which require protection of personal data.

(b) The purposes for which the Company processes the personal data of **Other Participants** are the following:

- Their identification for the purpose of participation to the General Meeting of Shareholders
- The communication with them for the purpose of participation to the General Meeting of Shareholders
- Their participation to the General Meeting of Shareholders.

The processing for the above purposes is based on the compliance with the Company's legal obligations, the fulfillment of obligations towards the Shareholders and for the purposes of legitimate interests of the Company (for the support and execution of main operations of the Company, the improvement of the operation and the fulfillment of the main purpose of its operation).

#### **IV. How do we protect your personal data?**

The Company, considering the issue of personal data security as of utmost importance, takes the appropriate organizational and technical measures in order to protect your personal data and ensure their secure processing. In particular, it implements an information security management system to ensure privacy, the security of the processing of data of natural persons and their protection against accidental or unlawful destruction, loss, alteration, prohibited dissemination or access and in general any other form of unfair processing. Furthermore, the Company has established appropriate physical, electronic and administrative procedures for the protection of information that are being collected.

#### **V. Who are the possible recipients of your personal data?**

We may share your personal data with:

- Our group of companies to the extent that such transfer is necessary for the pursuit of our purposes.

- Supervisory, judicial, independent and other Authorities and bodies, at a national and European level within the scope of their competences, after relevant written requests.
- Third (legal or natural persons) providers of services who will process your personal data for the performance of our purposes in accordance with our written instructions and formalities (Data Processors).
- The société anonyme under the name “Athens Stock Exchange S.A”.
- The société anonyme under the name “Hellenic Central Securities Depository S.A.”

When the information is transferred as aforementioned, we limit the extent of information that is disclosed to the strictly necessary for the performance of the specific purpose.

#### **VI. Are your personal data transferred outside the European Economic Area (EEA)?**

Any transfer of your personal data to third countries outside the European Economic Area (i.e. outside the countries-members of European Union, Norway, Iceland, Lichtenstein) will take place only in compliance with Data Protection Legislation and only if adequate guarantees are provided for the protection of personal data.

#### **VII. Which is the retention period for your personal data?**

The personal data that are processed by the Company shall be maintained for the entire duration that is necessary for the fulfillment of the purpose of processing. Upon its expiration (of the duration), these data are securely deleted unless otherwise required by the current applicable legislative or regulatory framework or as long as it is necessary for the defense of the Company’s rights before the Courts or other competent Authority.

#### **VIII. Which are the rights of Data Subjects?**

Each Data Subject has-under the conditions provided for in the applicable Data Protection Legislation- the following rights:

- Right to Information: The Company shall inform you on the processing of your data, such as, indicatively, which data it processes, for which purpose, on which legal basis, for how long does it keep them in a concise, transparent, comprehensible and easily accessible form, using a clear and simple statement.
- Right of Access: You have the right to receive from the Company a confirmation of whether or not your personal data are being processed, and if they are processed, you have a right of access the respective data.
- Right to Rectification: You have the right to request from the Company the rectification of your inaccurate personal data and the completion of your incomplete personal data.
- Right to Erasure: You have the right to ask from the Company the erasure of your personal data, provided they have been provided with your consent and under the

condition that they are no longer required for the purposes that we have described to you above, or for the coverage of our legal, tax or accounting claims or for the defense of our rights before any competent Court or any other Authority.

- Right to Restriction of Processing: You have the right to ensure from the Company the restriction of processing, under the conditions provided for in the Data Protection Legislation.
- Right to Data Portability: You have the right to ask from the Company to receive your personal data in a structured, commonly used and machine-readable format or you have the right to ask to transmit those data to another data controller.
- Right to Object the Processing due to Legitimate Interest: You have the right to object, at any time, to the processing of your personal data in accordance with the provisions of the Data Protection Legislation. In this case, the Company shall stop the processing, unless it demonstrates compelling and legitimate reasons which override your interests, rights and freedoms as a data subject or for the establishment, exercise or support of legal claims.

#### **IX. How can the data subjects exercise their rights?**

Your rights may be exercised via e-mail to the address: [dataprotection@dimand.gr](mailto:dataprotection@dimand.gr).

We will reply within one (1) month upon receipt of your request. It is noted that this time frame can be extended for further two (2) months, taking into account the complexity of your request and in general the number of the requests.

Furthermore, the Company undertakes the responsibility to inform you, without any undue delay, for any breach of your personal data, which may put your rights and freedoms at high risk and under the condition that it does not fall under one of the exemptions expressly provided for in the Data Protection Legislation.

In the event that you consider that the processing of your personal data does not comply with the Data Protection Legislation, you have also the right to submit a complaint concerning the processing of your personal data to the Data Protection Authority ("DPA"). You can contact the DPA in the following ways:

- Website: [www.dpa.gr](http://www.dpa.gr)
- Call center: +30 210 6475600
- Fax: +30 210 6475628
- E-mail: [complaints@dpa.gr](mailto:complaints@dpa.gr).

#### **X. Review-amendment of this Notice**

The Company reserves the right to amend, update, revise or change the present Notice periodically, if the Company considers it as necessary, without a prior notification and in accordance with the Data Protection Legislation and its policy regarding the

protection of personal data. The updated versions will be uploaded to our website (<https://dimand.gr/ir/shareholders-meetings/>) with the date of the last one.