

1. Introduction

1.1 Commitment of the Company

The protection of personal data is a key priority of the parent company of the DIMAND Group of Companies, namely **"DIMAND SOCIETE ANONYME - DEVELOPMENT AND EXPLOITATION OF REAL ESTATE AND CONSTRUCTIONS, SERVICES AND HOLDING"**, trading as "DIMAND S.A." (hereinafter referred to as the "Company"). The Company respects the privacy and is committed to the observance of professional secrecy and the general protection of individuals with regard to the processing of personal data.

1.2 Purpose and Scope

In order to ensure transparency in the collection and processing of your personal data, this General Privacy Notice (hereinafter referred to as the 'Notice') aims to inform you about the categories of personal data we collect and process, as well as about the purpose and means for collecting, storing, using and transmitting such personal data as appropriate.

2. Definitions

Term	Explanation / Definition
GDPR	The European General Data Protection Regulation (GDPR) 2016/679, which entered into force on 25 May 2018 and which establishes a unified legal framework for the protection of personal data in all EU Member States and any reference thereto should be interpreted in such a way as to include the applicable national legislation.
Personal data	Any information concerning an identified or identifiable natural person ('data subject'). An identifiable natural person is the one whose identity can be ascertained, 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

	<p>physical, physiological, genetic, psychological, economic, cultural or social identity of the said natural person.</p>
<p>Special categories of personal data ('Sensitive data')</p>	<p>Personal data which are, by their nature, particularly sensitive in relation to fundamental rights and freedoms merit specific protection as the context of their processing could create significant risks to the fundamental rights and freedoms. Any information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.</p>
<p>Processor</p>	<p>The natural or legal person, public authority, agency or another body that processes personal data on behalf of the Controller.</p>
<p>Data processing</p>	<p>Every act or a series of acts performed on Personal Data or on sets of Personal Data independently of the means used, such as the collection, entry, organizing, storage, adaptation or change, recovery, use, distribution or any other form of provision, association or combination, restriction, deletion or destruction.</p>
<p>Company / DIMAND / Dimand</p>	<p>The parent company of DIMAND Group of Companies, namely "DIMAND SOCIETE ANONYME - DEVELOPMENT AND EXPLOITATION OF REAL ESTATE AND CONSTRUCTIONS,</p>

	SERVICES AND HOLDING", trading as "DIMAND S.A."
Group	The DIMAND Group of Companies
Controller	The natural or legal person, public authority, agency or another body which, individually or jointly with others, determine the purposes and means of the processing of personal data. For the purposes of this Privacy Notice, 'Controller' is the Company which individually or jointly determines the purposes and means of the processing of personal data.
Data subject	The natural person to whom the personal data pertains.

3. Controller

DIMAND SOCIETE ANONYME - DEVELOPMENT AND EXPLOITATION OF REAL ESTATE AND CONSTRUCTIONS, SERVICES AND HOLDING

Registered office: 115 Neratziotissis Str., PC 151 24, Maroussi, Attica, Greece

Phone number: + 30 210 8774200

Fax: + 30 210 6801160

General Commercial Registry (GE.MI.) No.: 004854501000

For any matter pertaining to the processing of personal data, please contact us directly by email at: dataprotection@dimand.gr, from which address you will also receive confirmation of receipt of your request/query.

4. Legal basis for the processing of your Personal Data

4.1 Legal basis

Your personal data will be processed by DIMAND in accordance with the legitimate grounds (legal basis) for this processing, to the extent required or permitted by the General Data Protection Regulation and Law 4624/2019. The processing of special categories of personal data (including data concerning health, sex life, racial or ethnic origin, or religious beliefs) is always clearly and specifically justified, as defined below.

In all cases, the processing of your personal data is justified according to one of the following bases, which constitute the legitimate grounds for the processing of your personal data:

- to cover a job vacancy, where the data subject is a candidate for this position;
- to perform a contract to which the data subject is a party;
- to fulfill the corporate purpose and the general business activity of the Company;
- to comply with any obligations imposed by law, such as those for regulatory compliance purposes, for tax purposes, and so on;
- to safeguard and protect the Company's legitimate interests;
- to establish, exercise or defend legal claims of the Company;
- to meet the Company's obligations under labor and insurance legislation;
- based on the data subject's consent under the specific conditions set by the legal framework for the purpose of obtaining updates on the Company's activity, services, etc.;
- in order to protect the vital interests of the data subject, where the data subject is incapable of giving consent.

5. Which types of Personal data does the Company collect and process?

5.1 Data of prospective and existing members of the Board of Directors

In the context of its statutory organization and operation, the Company collects and processes personal data of prospective and existing members of the Board of Directors, which are strictly necessary for the Company's compliance with the law and its statutory obligations, as a listed Company in a regulated market in Greece.

In this framework, the Company collects the following data: Full name, Home address, Work address, Mobile phone, Home phone, Copies of qualifications, ID/Passport data, CV, Reference letters.

In particular:

- ❖ In order for the Company to comply with the requirements of Greek Law 4548/2018 on the Reform of the legislation on the Société Anonymes (SAs) and Greek Law 4706/2020 on Corporate Governance of Sociétés Anonymes listed in a regulated market in Greece, the members of the Board of Directors send to the Compliance Department, at least once annually, a Declaration of regarding Conflict of Interest, with the following information: Name, Function, Facts which may involve personal data and concern a possible or actual No Conflict of Interest. In this context, the Company maintains a Register of Statements of Conflicts of Interest wherein the assessment of the relevant Declarations is documented.

The relevant data is transmitted to the external consultant who provides Compliance services to the Company, and who is a Data Processor.

This data is kept in digital form for a period of twenty (20) years.

The legal basis for this processing is compliance with the obligations arising from L. 4548/2018 and L. 4706/2020 and the company's legitimate interest in effectively implementing its internal Policies and Procedures.

- ❖ In order for the Company to comply with the provisions of articles 99-101 of Law 4548/2018, the Members of the Board are invited, once a year, to send to the Company's Compliance Department a Declaration under Law 105 (Solemn Declaration L. 1599/86), wherein the following shall be recorded: all data requested by a Declaration under Law 105, as well as data on family status (i.e. if the member is unmarried, married, divorced and number of children), their direct and indirect holdings in legal entities and their professional commitments outside DIMAND Group. At the same time, the Company also maintains a Register of Related Parties, where the relevant data are mapped, as well as any additional relevant public information obtained by the competent Department (Financial Controlling).

The relevant data is transmitted to the external consultant who provides Compliance services to the Company, and who serves as a Data Processor.

This data is kept in digital form for a period of twenty (20) years.

The legal basis for this processing lies in the Company's compliance obligation with the provisions of Articles 99-101 of Law 4548/2018.

- ❖ For the compliance of the Company with the provisions of article 9 of the Law 4706/2020, the Company processes data provided by the Independent Non-Executive Members of the Board of Directors, regarding the Independence Criteria as described in the above article. With the exception of ordinary and extraordinary audits that may be carried out either by the Internal Audit Department or by the Compliance Department, where additional information may be requested from the Independent Non-Executive Members of the Board of Directors themselves or from third parties, all data collected and processed for this purpose is reflected in the Declaration of Independence of the Independent Non-Executive Members of the Board of Directors, i.e. the Declaration under Law 105. In this context, any data collected or requested in all Declarations under Law 105 (Solemn Declaration L. 1599/86), as well as the declaration by Independent Non-Executive Members either confirming compliance with the criteria of Independence set forth in Article 9 of Law 4706/2020 or disclosing existing dependencies, and providing a detailed description of such relationships.

The relevant data is transmitted to the external consultant who provides Compliance services to the Company, and who serves as the Data Processor.

This data is kept in digital form for a period of twenty (20) years.

The legal basis for this processing lies in the Company's compliance obligation with the provisions of Article 9 of Law 4706/2020 and its legitimate interest in effectively implementing its internal Policies and Procedures.

- ❖ To ensure the Company's compliance with article 3 par. 4 of Law 4706/2020 and to facilitate its timely participation in Public Tenders, Board members shall send a Solemn Declaration to the Compliance Department, at least annually, confirming the absence of any impediments as stipulated in the above article, and a copy of their Criminal Record to the General Directorate of Legal Services. As regards the Solemn Declaration, all data included in each Declaration of Law 105 is collected, and so is

the acknowledgment of each signatory that no impediment exists pursuant to the said article.

The relevant data is transmitted to the external consultant who provides Compliance services to the Company, and who serves as the Data Processor.

This data is kept in digital form for a period of twenty (20) years.

The legal basis for this processing lies in the Company's compliance with the provisions of Article 3 of Law 4706/2020 and in its legitimate interest in participating in tenders, with a view to fulfilling its main corporate purpose.

- ❖ In order to maintain a List of Persons holding Managerial Duties, the Company, through the Shareholders' Service and Corporate Announcements Unit, processes the following personal data: Full name, Father's full name, Investor's share number, Capacity, Full names of any persons in close relationship with the liable persons, Full names of the father of any persons in close relationship with the liable persons, Investor's share number of any persons in close relationship with the liable persons.

The relevant data is transmitted to the external consultant who provides Compliance services to the Company, and who serves as the Data Processor.

This data is kept in digital and/or printed form for a period of twenty (20) years.

The legal basis for this processing is the compliance of the Company with the requirements of Article 19 of Regulation (EU) 596/2014 and its legitimate interest in effectively implementing its internal Policies and Procedures.

- ❖ In order to maintain a List of Individuals Holding Inside Information, the Company, through the Shareholders' Service and Corporate Announcements Unit, processes the following personal data: Business phone number(s), Duties and reason for which the individual handles inside information, date and time at which the individual was included in the List, Date of birth, National identification number, Home and personal mobile phone numbers, Full home address, DSS share code, TIN.

The relevant data is transmitted to the external consultant who provides Compliance services to the Company, and who serves as the Data Processor.

This data is kept in digital form for a period of twenty (20) years.

The legal basis for this processing is the compliance of the Company with the requirements of Article 18 of Regulation (EU) 596/2014 and the Implementing Regulation (EU) 2022/1210, and its legitimate interest in effectively implementing its internal Policies and Procedures.

- ❖ The members of the Board of Directors, in the context of the evaluation and periodic re-evaluation of their Individual Suitability Criteria and the Collective Suitability of the Board of Directors, as well as for the purposes of compliance with the applicable tax and labor law, are invited to provide tax clearance certificates, statements of non-bankruptcy and Solemn Declarations for the Absence of Incompatibility and compliance with the content of DIMAND Group Code of Ethics, as well as biographical data. In this context, the Company collects and processes the data contained in the said certificates and Solemn Declarations, which is evaluated by the Nomination and

Remuneration Committee, with the support of the General Directorate of Legal Services and the Human Resources Department.

This data is kept in digital form for a period of twenty (20) years.

The legal basis for such processing is the Company's compliance with the applicable legislative and regulatory framework (L. 4706/2020 Article 3, Circular of the Capital Market Commission No. 60, Clarifications of the Capital Market Commission) and its legitimate interest in effectively implementing its internal Policies and Procedures.

- ❖ To facilitate the execution of educational programs and monitor the training activities of the Board of Directors, the Company, and in particular the Remuneration and Nominations Committee and the Human Resources Department, processes the following data: Full name, Job title, Contact information (email, phone) and the results of any assessments related to the training in question.

The data shall also be transmitted to an external training provider whenever the training is carried out with the assistance of a third party who, in this case, shall constitute a Data Processor.

This data is kept in digital form for a period of ten (10) years following the departure of the Member from the Company's Board of Directors.

The legal basis of this processing is the Company's compliance with the requirements of Article 14 of Law 4706/2020 and its legitimate interest for the effective implementation of the Training Policy of the Members of the Board of Directors.

- ❖ In order to conduct ordinary financial and tax audits, the Company processes the following data: Name and professional contact details, Job title, Identification details, Professional capacity, TIN, as well as any other personal data required to carry out the audits.

This data is transmitted to the external Certified Auditor of the Company, who serves as the Data Processor.

This data is kept in digital and/or printed form for a period of twenty (20) years.

The legal basis for this processing is the Company's compliance with the requirements of Greek Law 4449/2017.

- ❖ In order to participate in public tenders, the Company processes the following data: Name and contact details, Identification details, Job title in the Company, copy of the Criminal Record and Solemn Declarations that may be required for the successful participation in the tender process.

In the event that the submission of a tender is successful, the above data shall be kept in digital form for a period of twenty (20) years. Where the submission of a tender is unsuccessful, the above data shall be kept in digital form for a period of five (5) years.

The legal basis for this processing is the receipt of consent from the data subject and the legitimate interest of the Company for the proper satisfaction of the terms of each tendering procedure/call for tenders.

- ❖ For the purposes of organizing business trips for the members of the Board, the secretariat uses the following data: Name and contact details, Identification details, Contact information (email, phone).

The said data shall also be transmitted to travel agencies, which, as Data Processors, shall organize the business trips.

This data is kept in digital form for three (3) years.

The legal basis for this processing is the legitimate interest of the Company in fulfilling the main corporate purpose.

- ❖ In order to document the proceedings of the Board of Directors / Committees of the Board of Directors meetings and the General Meetings, the Company processes the following personal data: Name, Contact details, Identification details, Job title in the Company, other personal data that may be reported to the Board of Directors / G.M.

The said data, due to their fundamental importance, are kept in physical and digital form throughout the entire term of the company.

The legal basis for this processing is the Company's compliance with the applicable statutory requirements (L. 4548/2018 & 4706/2020) and the Hellenic Corporate Governance Code (EKED), and its legitimate interest in effectively implementing its internal Policies and Procedures.

- ❖ In order to draw up the Corporate Governance Statement for each corporate use, the Company processes the following personal data: Name, Capacity, CV, results of periodic evaluation, number of shares in the Company, external professional commitments.

This data, incorporated in the Company's annual financial report, is kept in digital form for a period of twenty (20) years.

The legal basis for this processing is Article 152 of Law 4548/2018.

5.2 Data of the Members of the Board of Directors Committees – Non-members of the Board of Directors (Independent third persons)

Regarding the Members of the Board of Directors Committees who do not also constitute Members of the Board of Directors, if any, the Company collects, stores and processes exactly the same personal data that it collects, stores and processes from the prospective or existing members of the Board of Directors, as reflected in the previous chapter.

5.3 Data of Shareholders and Related Persons

As regards the natural persons who constitute or have been shareholders of the Company, any person who has a voting right, their representatives, as well as the representatives of any shareholders or other persons exercising the voting right by representing legal persons, the Company processes personal data concerning these persons due to their status as shareholders of the Company.

In compliance with the Greek Law 4706/2020, the Company, and in particular the Shareholders' Service and Corporate Announcements Unit and the General

Directorate of Legal Services, collect the following data: Identification data, such as full name, father's name, ID or passport number or other equivalent document, TIN, occupation, citizenship and other demographic information, contact details such as postal and e-mail address, landline and/or mobile phone number etc., number and class of shares, share number in the Dematerialized Securities System (DSS), data on the capacity under which the shareholder participates in the General Meeting and the relevant supporting documents, correspondence data with the shareholders, data concerning the participation and exercise of voting rights of the shareholder in the General Meeting.

The above-mentioned personal data is collected either directly from the shareholder, or by third parties authorized by the shareholder or by the "Hellenic Central Securities Depository S.A."

The data of these persons shall be collected for the purpose of:

- identifying the shareholder;
- communicating with the shareholder;
- examining the possibility and legality of the exercise of shareholders' rights in accordance with the legislation (indicatively, exercise of participation and voting rights in the General Meeting, shareholder status, observance of minutes of the General Meeting, participation in corporate actions),
- fulfilling the Company's obligations toward its shareholders (e.g. payment of dividends);
- fulfilling and supporting legal rights and interests of the Company in the context of safeguarding possible legal claims of the Company;
- maintaining a historical record of the Company's shareholders.

This data is kept in digital form for a period of twenty (20) years.

The legal basis for this processing is the Company's compliance with the requirements of Law 4548/2018 and Law 4706/2020, as well as with the obligations on transparency under the Greek Law 3556/2007.

5.4 Employee and manager data

The Company collects and processes personal data of its staff, under any cooperation regime (employment, project-specific, fixed remuneration contract), which may include data, where appropriate, such as full name, father's name, mother's name, date of birth, gender, citizenship, postal address, e-mail address, phone number, ID number, social security number (AMKA) and institution, TIN and competent tax office, financial data, IBAN, bank account number, education details and information, qualifications, work experience details, recruitment date, job title, working hours, details of possible benefits provided by the Company, review data, marital status, certificates from bar associations and technical chambers etc.

This data is processed for the purposes of personnel and contractual relationship management throughout the working life, implementation of educational programs, performance of a contract (employment, project-specific, fixed remuneration

contract), calculation and payment of fees and benefits, compliance with the legislation (and in particular labor and insurance legislation on corporate governance of companies listed on a regulated market in Greece, legislation of public limited liability companies) and is legally based on the company's obligations under the above legislation, its contractual obligations toward its staff, and also on its legitimate interest in fulfilling its main business purpose.

This data may be shared with third parties who constitute Data Processors on behalf of the Company, such as consultants who have undertaken work on behalf of the Company (e.g. for the Compliance Department), the Auditors of the Company's Financial Statements, the external evaluators of the Company's Corporate Governance System and of the Internal Audit System, the ISO auditors, the cooperating banks, the Athens Stock Exchange, the EBRD and so on. Furthermore, data may be shared with the rest of the Group companies to serve purely administrative and management purposes, through shared access to a central database. In addition, it may be shared to the competent supervisory, judicial, police and other administrative authorities at national and European level, upon their legal request or in compliance with the legal obligation of the Company (such as the Hellenic Capital Market Commission, the National Transparency Authority, the Hellenic Labor Inspectorate, the ERGANI Information System etc.), and in accordance with the applicable legislative provisions.

Specific and detailed information is provided in writing by the Company to its staff in the context of recruitment/conclusion of a contract, but also in any change thereof, in compliance with Article 13 of the GDPR.

5.5 Data of prospective employees of the Company

The Company collects and processes personal data of prospective employees necessary to assess their suitability with the job (e.g. name, contact details, training, experience, etc.). This data is collected from applications submitted by prospective employees by any means (e.g. e-mail, physical correspondence, through a third-party provider/CV submission platform), as well as by documents attached to their application (e.g. CV, certificates, attestations etc.).

Where prospective employees include in their application the contact details of their previous employers, given that they have obtained their consent to do so, and they explicitly communicate those details to us, orally or in writing, we may contact them in order that they provide us with additional information about the job, their cooperation with the prospective employee and their performance reviews, in the context of checking the prospect's references.

We collect your data for the purpose of:

- evaluating the application you submitted and for which you expressed your interest. The legal basis for the processing is our legitimate interest, through staffing the Company with the best trained personnel that contributes to the fulfillment of the main corporate purpose, as well as the development of the Company's hospitality activities.

- keeping your CV for a period of not more than one year and to evaluate your suitability for relevant positions in the Company and/or the Group. This period may be extended only with your specific consent. The legal basis for the processing is the Company's legitimate interest, as stated above.
- contacting previous employers to have them provide us with information about your job, your cooperation with them and your performance reviews, only upon your specific consent. The legal basis is the Company's legitimate interest, as mentioned above.

5.6 Data of visitors at the Company's facilities

The Company collects and processes personal data of visitors to its facilities and in particular, the full name, professional or other status, contact details, time of entry into the Company facilities and time of departure.

We collect your data for the purpose of communicating and setting up meetings with Company executives.

The above data is kept in paper and/or digital form for a period of five (5) years.

In addition, for the purpose of scheduling meetings with the CEO and other executives, the Company will process the same data in addition to the email address, which will be kept digitally for the same period of time.

The legal basis for these processes is the Company's legitimate interest in supporting and performing basic operations, such as the security of the Company's premises, the proper distribution of meeting rooms and the effective communication for the planning of meetings.

5.7 Data of suppliers, partners and other counterparties

The Company cooperates with third parties (suppliers/external partners) to serve its statutory purposes and its daily operational needs. In this context, the Company collects, indicatively, the following data: Business name, Activity address, TIN, Tax Office, Contact Phone, Email, Bank account number.

We collect this data for the purpose of managing and fulfilling the contractual/professional relationship.

In particular:

- ❖ For the management of insurance policies, letters of guarantee, loan agreements, property valuations and other financial issues in the context of the implementation of the Company's investment plans, the Company processes the following data of the respective business partner: Name and contact details, Identification details, Job title, Professional status.

This data is kept in digital and/or printed form for twenty (20) years from the end of each cooperation.

The legal basis for such processing is the proper performance of the concluded contract.

- ❖ In order to carry out a financial audit to verify the business partner's account, the Company processes the following data: Name, Business contact details, Professional status, Invoice to be paid.

This data is kept in digital and/or printed form for a period of ten (10) years from the end of each cooperation.

The legal basis for such processing is the proper performance of the concluded contract and the legitimate interest of the Company for the fulfillment of the main corporate purpose.

- ❖ For the drawing up of the auditing and budgetary cost reports of its projects, the Company processes the following data: Name and business contact details, Professional status.

This data is kept in digital and/or printed form for a period of ten (10) years from the end of each cooperation.

The legal basis for such processing is the proper performance of the concluded contract and the legitimate interest of the Company for the fulfillment of the main corporate purpose.

- ❖ In order to conduct ordinary financial and tax audits, the Company processes the following data: Name and business contact details, Job title, Identification details, professional status, TIN, any other personal data required to complete the audits.

This data is transmitted to the external Certified Auditor of the Company, who serves as the Data Processor.

This data is kept in digital and/or printed form for a period of twenty (20) years.

The legal basis for such processing is the Company's compliance with the requirements of Law 4449/2017.

- ❖ For the purposes of quality management (ISO 9001), the implementation of environmental management systems (ISO 14001) and the implementation of health and safety management systems at work (ISO 45001), the Company processes the following data: Name, Job title, Employee/supplier review, Occupation/Capacity, health data (Accidents Book).

The relevant data shall also be transmitted to ISO auditors, who shall serve as Processors.

This data is kept in digital and/or printed form for a period of ten (10) years.

The legal basis for the above processing is the Company's legitimate interest to fulfill its main corporate purpose.

5.8 Data of property owners, tenants and buyers

The Company collects and processes personal data of owners, tenants and buyers of real estate, such as full name, address, phone number, TIN and Tax Office, property ownership data.

- ❖ We collect this data for the purpose of researching and evaluating new investments (real estate market), performing a property valuation (new investment), periodic

assessments of the Company's real estate, managing legal issues and providing legal advice, acquiring new real estate (legal/technical checks), pre-contractual assessment of the counterparty, in the context of KYC (Know Your Counterparty) screening, as well as technical checks for investment assessment.

The processing of this data is necessary:

- to comply with the requirements of the current legislative framework regarding Contracts and Leases;
- for the performance of the contract in question;
- to avoid drawing up a contract with a contracting party, that is charged with criminal convictions or international sanctions;
- to serve the Company's legitimate interests and its regulatory obligations (fulfillment of business purpose, defense of legal claims, support and execution of key operations, transparency obligations of transactions and disclosure of transactions with related parties).

In this context, in order to find, evaluate and formulate a proposal for the use of real estate, the Company processes the following data: Full name, Contact details, Exact location of the property.

This data is kept in physical form for five (5) years and in digital form for ten (10) years.

In this case, the legal basis of the above processing constitutes the proper fulfillment of the terms of the relevant contract concluded and the Company's legitimate interest in fulfilling its corporate purpose.

- ❖ In order to create topographical surveys (studies) for property owners, the Company processes the following data: Name, Exact location and Contact details (e.g. phone and email).

This data is transmitted to the collaborating engineers, who shall serve as Data Processors.

This data is kept in physical form until the completion of the project and in digital form for a period of ten (10) years from the completion of the project.

The legal basis of the above processing constitutes the proper fulfillment of the terms of the relevant contract concluded and the Company's legitimate interest in fulfilling its corporate purpose.

- ❖ For the management of the Company's contracts, the Company processes the following data of its counterparties – natural persons: > First name, Surname, ID number, TIN, Address of registered seat.

This data is kept in a physical and electronic file for a period of twenty (20) years.

The legal basis of the above processing constitutes the proper fulfillment of the terms of the relevant contract concluded and the Company's legitimate interest in fulfilling its corporate purpose.

5.9 User Data of the Company's Website

The Company collects and processes personal data submitted by the users of its website through the info@dimand.gr e-mail address and the suggestions/complaints submission form.

In particular, the following data is collected: Name (if the request is made by name), email, industry represented and any personal data that may be contained within the email.

We collect your data for the purpose of responding to your request having as a legal basis the Company's legitimate interest in supporting and performing basic operations, as well as serving the Company's stakeholders, such as shareholders, interested partners, prospective employees, contractors, suppliers, public authorities, etc.

In addition, the legal basis for the processing is the explicit consent of the users of the Company's website, who may register their e-mail address to the mailing list in order to receive newsletters from the Company. The relevant list is kept online for three (3) years.

In this context, it is clarified that the Company collects, stores and processes only the registered email addresses for the purposes of *non-automated* dispatch of the aforementioned Newsletters.

5.10 Data from corporate events and activities

For the purposes of corporate events and activities and the promotion of the corporate profile to the public, the Company shall process personal data of its staff, as well as of its partners, suppliers, journalists and other potential third parties, such as photos, videos, contact details, full name, professional capacity, information that may be obtained, transmitted or posted on corporate profiles on social networks and/or media.

The legal basis for this processing is the Company's legitimate interest in managing the corporate profile on social networks and media, and promoting its important announcements and press releases, exclusively for the above-mentioned purpose.

This data may be processed by third parties, such as photographers, event organizers, production companies, who in this case will serve as Processors.

The photos are kept electronically for the historical purposes of the Company's archive throughout the entire corporate life, while other data are kept electronically and deleted after ten (10) years.

5.11 Telephone and physical mail communication data

Whenever someone contacts the Company's secretariat by telephone, the following data is collected: Name, Function/Occupation and Contact information (email, phone number).

Where the said physical or electronic correspondence is sent to the Company, the following data is collected: Sender's name, Capacity/Profession, Contact information (email, phone number), Sender's address and personal data contained within the correspondence. Following communication on your part, the relevant company's

executive may contact you further to process your request, provide/receive information, further communication on the subject of your interest, etc. The above does not mean that this communication cannot include any other specific disclosure to you regarding personal data.

The purpose of the above processing is to efficiently and effectively organize the Company's secretarial support and to fulfill the Company's corporate purpose.

The legal basis of the above processing constitutes the Company's legitimate interest for its smooth and effective operation.

The above data is kept in digital and/or printed form for three (3) years.

5.12 Audit Committee

In compliance with the requirements of Article 44 of the Greek Law 4449/2017, the Company, as an audited entity of public interest, has set up an Audit Committee.

In order to supervise the process of financial reporting, the Audit Committee may process any personal data of any relevant natural person involved.

This data is kept in physical and digital form for a period of twenty (20) years.

The legal basis for this processing is the compliance of the Company with the requirements of Article 44 of Law 4449/2017 and Article 74 of Law 4706/2020.

In order to effectively supervise the Internal Audit Committee, the Audit Committee may process any personal data of any relevant natural person involved.

This data is kept in digital form for a period of twenty (20) years.

The legal basis for this processing is the compliance of the Company with the requirements of Article 44 of Law 4449/2017 and Article 10 and Article 74 of Law 4706/2020.

5.13 Remuneration and Nominations Committee

In compliance with the requirements of Articles 10,11,12 of Law 4706/2020, the Company, as a public company with shares listed in a regulated market in Greece, has set up a Remuneration and Nominations Committee.

For the assessment of the suitability of Board members in the context of the evaluation of nominations and on an annual basis, for the determination of the independence of independent non-executive members, for the training of Board members, managers and staff, for the evaluation of the effectiveness of the Board and the evaluation of Board members and executives, for matters of succession plans of Board members and managers, as well as for issues of remuneration of persons covered by the Company's remuneration policy, the Committee may process personal data of the members of the Board and the Company's managers, such as details of Solemn Declarations (Full name, Father's name, Mother's name, Date of

birth, Address of residence, Identity number, Phone details, email), tax clearance certificates, non-bankruptcy certificates and Solemn Declarations on absence of incompatibilities and the compliance with the content of the Group's Code of Ethics, remuneration certificates, certificates (such as family status, education, professional experience), CVs.

This data is kept in digital form for a period of twenty (20) years.

The legal basis for this processing is the Company's compliance with the requirements of Articles 10, 11, 12 of Law 4706/2020 and the Greek Corporate Governance Code which it adopts.

5.14 Internal Audit Department

The Company, as a listed public company, in order to comply with the requirements of Law 4706/2020, has set up an Internal Audit Unit, which is required to process personal data, in order to perform its duties. To carry out internal audits of the Company within the framework of the annual audit plan, the Internal Audit Unit may process any personal data of any natural person involved in the audit.

This data is kept in digital form for a period of twenty (20) years.

The legal basis for the processing is the compliance of the Company with the requirements of Law 4706/2020 (articles 15,16).

5.15 Compliance Department

Due to the listing of the Company's shares in the regulated market of the Athens Stock Exchange, the Company also has a Regulatory Compliance Unit. The services of the Compliance Unit are provided by an external consultant, who is, in this case, the Processor.

In order to carry out analyses of deviations, conformity assessments and regulatory compliance risk assessments, the Compliance Department may process any personal data of any natural person involved in the procedure.

This data is kept in digital form for a period of twenty (20) years.

The legal basis for the processing is the compliance of the Company with the requirements of Law 4706/2020.

5.16 Receipt and Management of Reports / Complaints

In order for the Company to comply with the requirements of Law 4990/2022 and Law 4808/2021, it has established a Group Policy and a Procedure for submitting and managing Reports, as well as an anti-harassment policy in the workplace. Furthermore, in order to obtain and maintain the relevant ISO certificate, as well as to comply with the best international practices, the Company has established a Group Anti-Corruption and -Bribery Policy.

In regard to the Greek Law 4990/2022, the Company has appointed a Person Responsible for Receiving and Following-up on whistleblowing Reports (YPPA). For the submission and management of such whistleblowing Reports, the YPPA processes the following data of any person involved: Reporting person: Full name, Father's name, Position, Contact phone, email / Subject of the report: Full name, Position / Person affected (if not the same as the reporting person): Name, Position / Other parties involved, such as witnesses: Name, Position, as well as personal data captured within the free text of the Reporting form.

The said data is transmitted both within the Company (e.g. to the Compliance Unit, the Internal Unit, the Anti-Bribery Officer, if a relevant incident is appointed) and to the corporate entities that may assist in the case, as well as outside the Company (e.g. to the National Transparency Authority, the Securities and Exchange Commission).

This data is kept in digital form for twenty (20) years after the resolution of the case.

The legal basis for the processing is the Company's compliance with the requirements of Law 4990/2022, as well as the legitimate interest of the Company for the maintenance of the relevant ISO certificate (anti-bribery, anti-corruption, etc.).

Regarding the Greek Law 4808/2021, the Company has designated a Reporting person for filing Complaints of violence and harassment at the workplace. For the submission and management of these Complaints, the Company processes the following data of any natural person involved: Reporting person: Full name, Father's name, Position, Contact phone, email / Subject of the report: Full name, Position / Person affected (if not the same as the reporting person): Name, Position / Other parties involved, such as witnesses: Name, Position, as well as personal data captured within the body of the Complaint.

This data is kept in digital and/or printed form for (5) years from the resolution of the case, and generally in digital form for a period of twenty (20) years from the resolution of the case.

The legal basis for the processing is the compliance of the Company with the requirements of Law 4808/2021.

6. Transfers of Personal Data

The personal data you provide us with is kept and stored safely. We may share your information:

- To our group of companies to the extent that such transmission is necessary for the pursuit of our purposes and the compliance of the Group's companies with the tax legislation applicable at any time per jurisdiction. It should be stressed at this point that the Group's companies are active in Greece and Cyprus, so this data is transferred exclusively within the European Union.
- With Supervisory, Judicial, Independent and other Authorities at national and European level, in the context of issuing fines, following relevant requests or

whenever necessary. These authorities are all located within the European Economic Area and therefore there are no transmissions of your data outside it.

- To third parties (legal or natural persons) who will process your personal data in order for them to pursue our purposes in accordance with our written instructions and formalities (Data Processors), as well as Co-Controllers. The above cases include the Chartered Auditors of our Company's Financial Statements, the external evaluators of our Corporate Governance System and our Internal Audit System, the ISO Auditors, the cooperating banks, the Athens Stock Exchange etc. The Processors on our behalf and any Co-Controllers are currently located within the European Economic Area and therefore there are no transmissions of your data outside it.

When information is transmitted in accordance with the above, we limit the scope of the information communicated to the extent strictly necessary to achieve this purpose.

Any data transfer to third countries outside the European Economic Area (i.e. outside the Member States of the European Union, Norway, Iceland, and Liechtenstein) will only take place in compliance with the legal framework concerning data protection and only when adequate safeguards are provided to protect your data.

7. Security of Personal Data

The Company considers the issue of personal data security as very serious and for this reason we take measures aimed at the safe processing of personal data and the prevention of accidental loss or destruction and unauthorized and/or illegal access to it, use, modification or disclosure. We have all the appropriate physical, electronic and administrative procedures in place to safeguard the information we collect. We do not have any control over the privacy of emails until they reach us. We recommend that you do not include confidential, private or sensitive information on emails.

8. Information on the use of cookies

The Company's Website uses trackers, also known as "cookies".

Cookies are small data/text files that are stored on your computer's hard drive by your browser and which are necessary for the use of our Website.

The Company has an approved Tracker/Cookies Management Policy, which we invite you to review in order to gain knowledge of all cookies used, as well as the purposes for which each of them, by category, is collected, stored and processed by the Company.

9. For how long we will keep your data

Any personal data processed by the Company is kept imperatively for the duration required for fulfilling the purpose of the processing. At the end of this duration, the data is deleted unless otherwise specified by the applicable legislative and regulatory framework, or as required to defend the Company's rights before a Court of law or another competent authority.

10. Your rights and how to exercise them

Any natural person whose data is processed by the Company is entitled to the following rights in accordance with the applicable law:

Right to Information

The Company shall provide you with any information relating to the processing of your data, including but not limited to the type of data it processes, the purpose, the storage duration in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

Right of Access

You have the right to obtain confirmation from the Company as to whether or not personal data concerning you is being processed, and, where that is the case, access to the said personal data.

Right to Rectification

The Company shall provide you with any information relating to the processing of your data, including but not limited to the type of data it processes, the purpose, the storage duration in a concise, transparent, intelligible and easily accessible form, using clear and plain language. You have the right to request from the Company the rectification of inaccurate personal data and the completion of any incomplete data pertaining to you.

Right to Erasure

You have the right to request from the Company to delete your personal data, provided that it has been given with your consent and under the condition that it is no longer required for the fulfillment of the purposes described above, or for the coverage of the legal, tax or accounting requirements or to defend our rights before any competent Court of law or any other authority.

Right to Restriction of Processing

You have the right to secure from the Company the restriction of processing, subject to certain conditions.

Right to Portability

You have the right to request from the Company to send you your personal data in a structured, commonly used and machine-readable format, or to transmit it to another provider without any hindrance.

Right to Object to Processing due to Legitimate Interest

You have the right to object at any time to the processing of your personal data. In this case, the Company shall cease processing, unless it can demonstrate compelling legitimate grounds which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims.

Your rights may be exercised via e-mail as follows:

dataprotection@dimand.gr

We undertake to respond within fifteen (15) days of receipt of your request.

However, this period may be extended for two (2) months taking into account the complexity of your request, as well as the number of requests in general. In such cases, however, it shall be noted that you will receive relevant notification from the above same Company email address, which is managed by the General Directorate of Legal Services of the Company.

Furthermore, the Company undertakes to inform you, without undue delay, of any breach of your personal data which may put your rights and freedoms at high risk, provided that this does not fall under any of the exceptions expressly provided for by the law. In any case, if you notice any violation of the protection of your personal data you have the right to appeal to the Hellenic Data Protection Authority.

Right to submit a complaint to the Hellenic DPA

You also have the right to lodge a complaint about the processing of your personal data with the Data Protection Authority (DPA). You can contact DPA as follows:

- Web page: www.dpa.gr
- Call Center: +30 210 6475600
- Fax: +30 210 6475628
- E-mail: complaints@dpa.gr

11. Links – Hyperlinks to other websites

The Company's Website contains links to the social media websites of YouTube, LinkedIn, Instagram and Facebook, which are out of our control. The placement of these links has been done for the sole purpose of facilitating visitors/users during their browsing on the Internet.

Please note that we do not control these websites and that the Privacy Notice does not apply to them. We advise you to read the privacy statements and the terms and conditions of the linked or referenced websites you visit.

Access using the links provided to the respective website takes place under the sole responsibility of the users themselves.

12. Update – Changes to this Notice

The Company reserves the right to modify, update, revise, or otherwise change this Notice from time to time, if deemed necessary, without prior notice and in accordance with the applicable law.

For this reason, please check this Notice at regular intervals in order to be informed of any modified versions. The updated versions will be published on our website with

the last modified date, so that you are always kept informed about our most up-to-date Notice.

Latest update of the Privacy Notice: 20/06/2024